

## TSD File Inventory Index

Date: January 16, 2001

Initial: CM Lencinas

Facility Name: <u>BFS (Huron Technical Center One Folder Site)</u>	
Facility Identification Number: <u>DHD 001 288 169</u>	
<b>A.1 General Correspondence</b>	<b>B.2 Permit Docket (B.1.2)</b>
<b>A.2 Part A / Interim Status</b>	<b>.1 Correspondence</b>
<b>.1 Correspondence</b>	<b>.2 All Other Permitting Documents (Not Part of the ARA)</b>
<b>.2 Notification and Acknowledgment</b>	<b>C.1 Compliance - (Inspection Reports)</b>
<b>.3 Part A Application and Amendments</b>	<b>C.2 Compliance/Enforcement</b>
<b>.4 Financial Insurance (Sudden, Non Sudden)</b>	<b>.1 Land Disposal Restriction Notifications</b>
<b>.5 Change Under Interim Status Requests</b>	<b>.2 Import/Export Notifications</b>
<b>.6 Annual and Biennial Reports</b>	<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>
<b>A.3 Groundwater Monitoring</b>	<b>D.1 Corrective Action/Facility Assessment</b>
<b>.1 Correspondence</b>	<b>.1 RFA Correspondence</b>
<b>.2 Reports</b>	<b>.2 Background Reports, Supporting Docs and Studies</b>
<b>A.4 Closure/Post Closure</b>	<b>.3 State Prelim. Investigation Memos</b>
<b>.1 Correspondence</b>	<b>.4 RFA Reports</b>
<b>.2 Closure/Post Closure Plans, Certificates, etc</b>	<b>D. 2 Corrective Action/Facility Investigation</b>
<b>A.5 Ambient Air Monitoring</b>	<b>.1 RFI Correspondence</b>
<b>.1 Correspondence</b>	<b>.2 RFI Workplan</b>
<b>.2 Reports</b>	<b>.3 RFI Program Reports and Oversight</b>
<b>B.1 Administrative Record</b>	<b>.4 RFI Draft /Final Report</b>

Total -/

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.8 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual fielder's schedule





State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

RECEIVED MAY 14 1993  
WMD RCRA  
RECORD CENTER

George V. Voinovich  
Governor

Donald R. Schregardus  
Director

April 22, 1993

Bridgestone Firestone Inc.  
Attn: David McMillen  
1200 Firestone Parkway  
Akron, OH 44317

RE: EPA ID#: OHD001288109

LOCATION of INSTALLATION: 1200 Firestone Pkwy  
Akron, OH 44317

In response to your request of March 1993 the following information has been updated:

Name: BFS Akron Technical Center  
(formerly listed as Firestone Tire and Rubber Co)

Contact: David McMillen (216)379-7350

Owner: Bridgestone/Firestone Inc.

No longer listed as a transporter.

Added waste code: D035

Deleted waste codes: D003, F001, F003, F004, F005, U002, U122, U201

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

*Thomas E. Crepeau*

Thomas E. Crepeau, Manager  
Data Management Section  
Division of Hazardous Waste Management

TEC/bab

cc: U.S. EPA, Region V  
Ohio EPA District Office

**Public  
Participation**

You are not required to file the 1989 Waste Minimization Report if, during 1989, this site was NOT a large quantity generator and did NOT treat, store, or dispose of hazardous wastes on-site in units subject to Ohio hazardous waste permitting requirements. However, you are requested to return the form below, indicating that you are exempt from the report requirement. Ohio EPA will use this form to distinguish sites that are exempt from reporting requirements from those sites that are out of compliance.

Return this form to:

Ohio EPA  
Division of Solid and Hazardous Waste Management  
Attn: Thomas E. Crepeau  
1800 WaterMark Drive  
P.O. Box 1049  
Columbus, Ohio 43266-0149

RECEIVED  
OHIO EPA

FEB 16 1990

DIV. OF SOLID & HAZ. WASTE MGT.

This site is exempt from the requirement to file the 1989 Waste Minimization Report because:

- \* the site was not a large quantity generator in 1989, AND
- \* the site did not treat, store, or dispose of hazardous wastes on-site in units subject to Ohio hazardous waste permitting requirements in 1989.

It is expected that this site will remain exempt from the requirement to file the Waste Minimization Report:

Check one: ☒ For 1989 only  
☐ Permanently  
☐ Other (Explain Below)

EPA ID# OH0001288109

Site Name Firestone World Headquarters

Site Location Address 1200 Firestone Parkway  
AKRON, OHIO 44317

Contact Name D.C. McMillen Phone Number 216-379-7350

Comments/Explanation:

DAVID C. McMillen  
PRINT/TYPE NAME & TITLE

David C. McMillen  
SIGNATURE

2/12/90  
DATE

11-3-90

**A.2 Part A/  
Interim Status**





State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149



February 23, 1988

Richard F. Celeste  
Governor

Re: Firestone Tire & Rubber Company  
US EPA ID No.: OHD001288109  
Ohio Permit No.: 02-77-0325  
Completion of Closure Process

The Firestone Tire & Rubber Company  
Attn: Dennis R. Zwink, Corp. Risk Manager  
1200 Firestone Parkway  
Akron, Ohio 44317

Dear Mr. Zwink:

According to our records, all necessary activities have been completed at your facility regarding closure of your waste storage pad. Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a transporter and generator of hazardous waste with less than 90 days storage.

You should continue to use the identification number assigned to you by the US EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087, tel.: (216) 425-9171.

Very truly yours,

Thomas E. Crepeau  
Program Planning and Management Section  
Division of Solid and Hazardous Waste Management

TEC/LLL/dhs

cc: Rebecca Strom, US EPA, Region V  
Hazardous Waste Facility Board  
Randy Meyer, TA&ES, DSHWM  
Debbie Berg, DSHWM, NEDO

2077R(5)

RECEIVED

FEB 29 1988

U.S. EPA, REGION V

OCT 0 8 1986

5HS-JCK-13

Mr. David C. McMillen  
Firestone Tire and Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44137

RE: Closure Plan  
Firestone Tire and Rubber Company  
OHD 001 288 109

Dear Mr. McMillen:

The U.S. Environmental Protection Agency (U.S. EPA) received a copy of the above-referenced facility's closure plan on August 18, 1986. This plan was previously submitted to the Ohio Environmental Protection Agency (OEPA) on March 6, 1986. The plan concerned the closure of a hazardous waste container storage area located at the facility.

The OEPA approved the plan conditionally in a letter dated September 24, 1986. The U.S. EPA concurs with the OEPA's review and approval with the conditions stipulated.

If you have any further questions, please contact Ms. Rebecca Strom of my staff, at (312) 886-6194.

Sincerely,

Karl E. Bremer, Chief  
Technical Programs Section

cc: Tony Sassoon, OEPA  
Tom Carlisle, OEPA  
Tom Crepeau, OEPA  
Jennie Tuckerman, OEPA-NEDO

bcc: Rebecca Strom ✓  
Part A File

5HS-JCK-13:B.Strom:GGW:Disk #1A:10-1-86:



State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049  
(614) 466-8565



Richard F. Celeste, Governor

RECEIVED

SEP 25 1986

CERTIFIED MAIL

September 24, 1986

SWD - AIS  
U.S. EPA, REGION V

Re: CLOSURE PLAN, FIRESTONE TIRE AND  
RUBBER COMPANY  
OHD001288109

Mr. D.C. McMillen  
Firestone Tire and Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44317

Mr. McMillen:

On March 6, 1986, the Firestone Tire and Rubber Company submitted a closure plan for the hazardous waste drum storage area located at 1200 Firestone Parkway, Akron, Ohio. Revisions to the closure plan were received on August 11, 1986. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Firestone Tire and Rubber Co.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of Firestone Tire and Rubber Co. in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at Firestone Tire and Rubber Co. meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by Firestone Tire and Rubber Co. is hereby approved.

Please be advised that approval of this closure plan does not release Firestone Tire and Rubber Co. from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Due to the fact that the Ohio EPA is not currently authorized to conduct the federal hazardous waste program in Ohio, your closure plan also must be reviewed and approved by USEPA. Federal RCRA closure regulations (40 CFR 265.112) require that you submit a closure plan to George Hamper, Chief, Waste

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: David Davis Date: 9/24/86

RECEIVED

SEP 25 1986

SOLID WASTE BRANCH  
OHIO EPA, REGION V

Ohio Environmental Protection Agency  
ENTERED DIRECTOR'S JOURNAL

SEP 24 1986



Mr. McMillen  
Page Two  
September 24, 1986

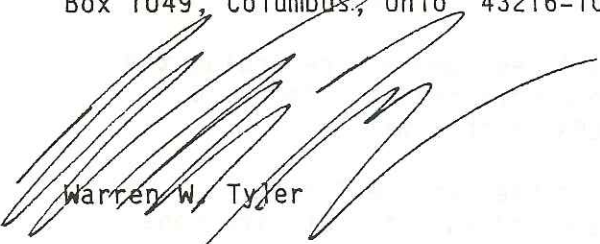
Management Division, Technical Programs Section, Ohio Unit, USEPA, Region V, 5HW-13, 230 South Dearborn Street, Chicago, Illinois 60604. Approval by both agencies is necessary prior to commencement of activities required by the approved closure plan.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 250 East Town Street, Room 101, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: James Flautt, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43216-1049.

Ohio Environmental Protection Agency  
ENTERED DIRECTOR'S JOURNAL

SEP 24 1986

  
Warren W. Tyler

DF/ara

cc: James Flautt, DSHWM  
George Hamper, USEPA, Region V  
Rebecca Strom, USEPA, Region V  
Jennie Tuckerman, NEDO, Ohio EPA

1370U

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: David Davis Date 9/24/86





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
111 West Jackson Blvd.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
RCRA ACTIVITIES

**APR 22 1982**

Mr. R. B. Jereb, Coor., H.W.  
Firestone T & R Company  
1200 Firestone Parkway  
Akron, OH 44317

RE: Interim Status Acknowledgement      USEPA ID No. OHD001288109  
FACILITY NAME: Firestone T & R Company

Dear Mr. Jereb:

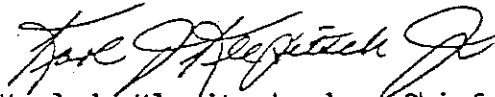
This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

  
Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

*Handwritten:* 4-20-82

Enclosure

cc: George W. Aucott, Vice President

FACILITY NAME  
\*\*\*\*\*  
FIRESTONE T & R CO

EPA ID NUMBER  
\*\*\*\*\*  
OHD001288109

FACILITY OPERATOR  
\*\*\*\*\*  
FIRESTONE TIRE & RUBBER CO

FACILITY OWNER  
\*\*\*\*\*  
FIRESTONE TIRE & RUBBER CO

FACILITY LOCATION  
\*\*\*\*\*  
1200 FIRESTONE PARKWAY  
AKRON OH 44317

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
*****	*****	*****
S01	1000.00000	G

\*\*\*\*\*KEY\*\*\*\*\*

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	* UNIT OF MEASURE	CODE
*****	*****	*****	*****	*****
STORAGE:			* GALLONS	G
*****			* LITERS	L
CONTAINER	S01	G OR L	* CUBIC YARDS	Y
TANK	S02	G OR L	* CUBIC METERS	C
WASTE PILE	S03	Y OR C	* GALLONS PER DAY	U
SURFACE IMPOUNDMENT	S04	G OR L	* LITERS PER DAY	V
DISPOSAL:			* TONS PER HOUR	D
*****			* METRIC TONS\HOUR	W
INJECTION WELL	D79	G, L, U, OR V	* GALLONS\HOUR	E
LANDFILL	D80	A OR F	* LITERS\HOUR	H
LAND APPLICATION	D81	B OR G	* ACRE-FEET	A
OCEAN DISPOSAL	D82	U OR V	* HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	* ACRES	B
TREATMENT:			* HECTARES	Q
*****			* POUNDS\HOUR	J
TANK	T01	U OR V	* KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	* TONS PER DAY	N
INCINERATOR	T03	D, W, E, OR H	* METRIC TONS\DAY	S
OTHER	T04	J, P, N, S, U, V	*	



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• OHD001288109

REACKNOWLEDGEMENT

FIRESTONE TIRE & RUBBER CO  
1200 FIRESTONE PARKWAY  
AKRON

OH 44317

INSTALLATION ADDRESS

1200 FIRESTONE PARKWAY  
AKRON

OH 44317



# IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001 23 - 26	2 F002 23 - 26	3 F003 23 - 26	4 F004 23 - 26	5 F005 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 P083 23 - 26	32 P117 23 - 26	33 U002 23 - 26	34 U013 23 - 26	35 U122 23 - 26	36 U201 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE  
(D001)

☒ 2. CORROSIVE  
(D002)

☒ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) PLANT MANAGER	DATE SIGNED 8-6-80
--	--	-----------------------

FORM 1  
GENERAL  
EPA  
ENVIRONMENTAL PROTECTION AGENCY  
GENERAL INFORMATION  
Consolidated Permits Program  
(Read the "General Instructions" before starting.)

of priority  
A. FIRST  
ONS  
T/A/C  
0.9  
3 D  
13 14 15

LABEL ITEMS  
EPA I.D. NUMBER  
III. FACILITY NAME  
V. FACILITY MAILING ADDRESS  
VI. FACILITY LOCATION

OHD001288109

FIRESTONE TIRE & RUBBER CO.  
1200 FIRESTONE PARKWAY  
AKRON, OHIO 44317

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		NO*	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP FIRESTONE TIRE & RUBBER COMPANY.

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)		
2 ALLEN, CHARLES, T.	CHIEF CHEMIST	2.16	3.79	6.83.6

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3 1200 FIRESTONE	PARKWAY	AKRON	OH	44317	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5 1200 FIRESTONE	PARKWAY	SUMMIT	AKRON	OH	44317	153		



CONTINUED FROM THE FROM

## VII. SIC CODES (4-digit, in order)

E. FIRST				B. SECOND			
7	3	0	1	7			
(specify)				(specify)			
TIRE MANUFACTURING							
C. THIRD				D. FOURTH			
7				7			
(specify)				(specify)			

## VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?	
8 FIRESTONE TIRE & RUBBER COMPANY												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)												D. PHONE (area code & no.)	
F - FEDERAL S - STATE P - PRIVATE				M - PUBLIC (other than federal or state) O - OTHER (specify)				P (specify)		A 216 379 7000			
E. STREET OR P.O. BOX													
1200 FIRESTONE PARKWAY													
F. CITY OR TOWN						G. STATE		H. ZIP CODE		IX. INDIAN LAND			
A K R O N						O H		44317		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)												D. PSD (Air Emissions from Proposed Sources)											
9 N R325CD												9 P											
B. UIC (Underground Injection of Fluids)												E. OTHER (specify)											
9 U												(specify)											
C. RCRA (Hazardous Wastes)												E. OTHER (specify)											
9 R												S.E.E.A.T.T.A.C.H.M.E.N.T.											

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description)

TIRE MANUFACTURING

F94

51

## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
GEORGE W. AUCOTT, VICE PRES. MANU. N. AMERICA TIRE GROUP		George W. Aucott		11/12/80	


## COMMENTS FOR OFFICIAL USE ONLY

C											
15 16 17 18 19 20 21 22 23 24 25											

Please print or type in the unshaded areas only  
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA



ENVIRONMENTAL PROTECTION AGENCY  
**HAZARDOUS WASTE PERMIT APPLICATION**  
Consolidated Permits Program  
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER  
FOHD00128810931

FOR OFFICIAL USE ONLY

APPLICATION APPROVED

DATE RECEIVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR. MO. DAY  
8 11 03 01

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. MO. DAY

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>			<b>Treatment:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
<b>Disposal:</b>			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)			1. AMOUNT	2. UNIT OF MEASURE (enter code)
X-1	S02	400	G	5			
X-2	T03	20	E	6			
1	S01	1000	G	7			
3				8			
4				9			
				10			

EPA Form 3510-3 (6-80)

PAGE 1 OF 5

NOV 13 1980

CONTINUE ON REVERSE



**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

<b>ENGLISH UNIT OF MEASURE</b>	<b>CODE</b>	<b>METRIC UNIT OF MEASURE</b>	<b>CODE</b>
POUNDS . . . . .	P	KILOGRAMS . . . . .	K
TONS . . . . .	T	METRIC TONS . . . . .	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

[illegible]

**IV. DESCRIPTION OF HAZARDOUS WASTE** *(continued)***E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

5	F	0	H	D	0	0	1	2	8	8	1	0	9	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

**V. FACILITY DRAWING**

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**VI. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

**VII. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes &amp; seconds)

LONGITUDE (degrees, minutes &amp; seconds)

4	1	0	3	0	0	6
65	66	67	68	69	70	71

0	8	1	3	1	0	5	5
72	73	74	75	76	77	78	79

**VIII. FACILITY OWNER**☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

E															
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F															
35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50

**IX. OWNER CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

GEORGE W. AUCOTT, VICE PRES.  
MANU. N. AMERICA TIRE GROUP

George W. Aucott

11/12/80

**X. OPERATOR CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

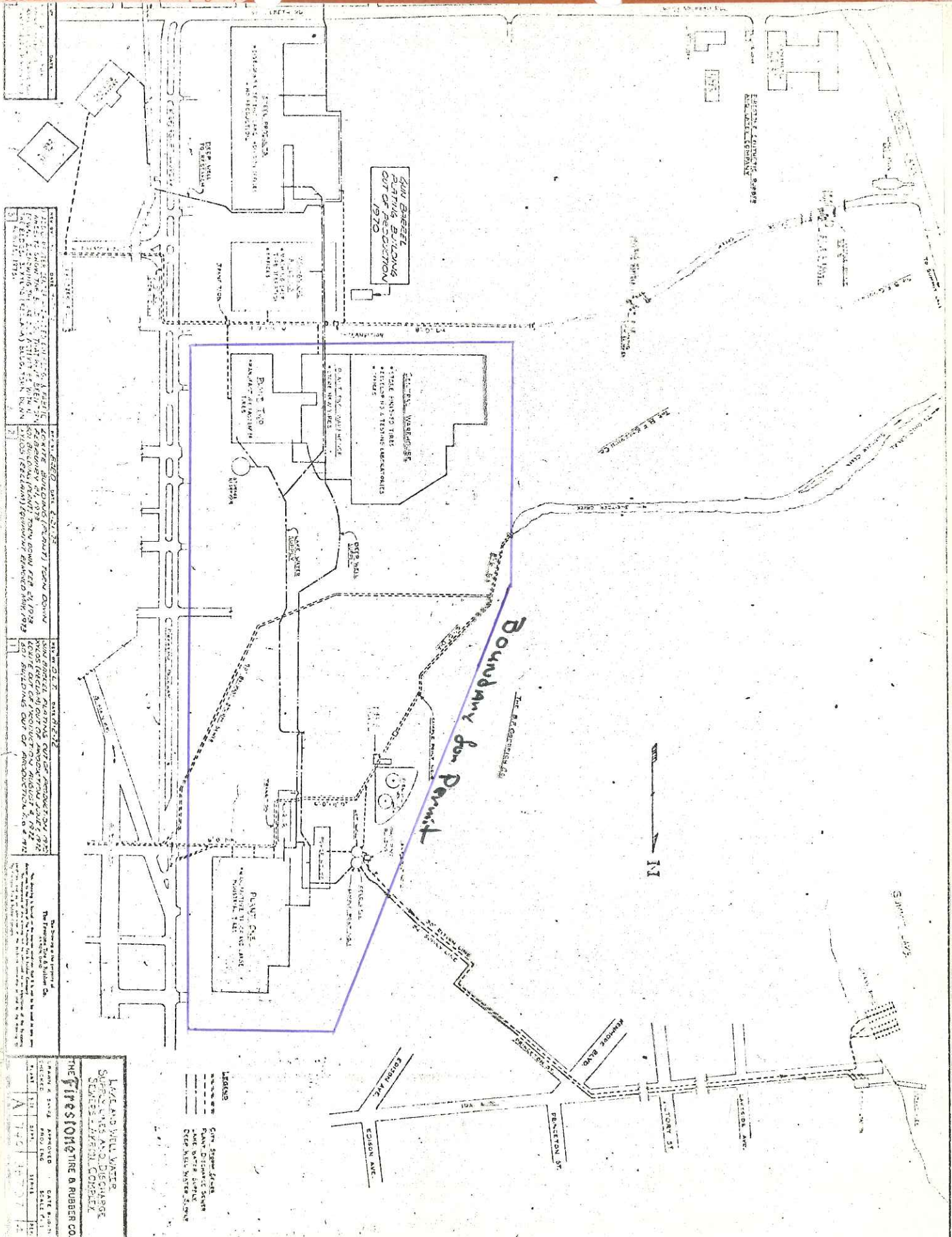
C. DATE SIGNED

462

## E. OTHER PERMITS

PERMIT NUMBER	EMISSION SOURCE	POLLUTANT	EXPIRATION DATE
16-010129 PD 53	BUFFER NO 4, BUFFER GRINDER, SMALL CUT-OUT	RUBBER DUST	REGISTRATION
PD 56	BUFFER, GRINDER, PAINTER WHITE SIDEWALL	RUBBER DUST PAINT FUMES	"
PD 58	HVY DUTY BUFFING - BALANCE PATCH	RUBBER DUST	"
PD 63	AIRBAG GRINDING	RUBBER DUST	"
PD 64	DOPE MIXING & BEAD CEMENTING		10-21-83
PD 65	BANBURY RUBBER MIXING 72, 73, 74	CARBON BLACK	REGISTRATION
PD 70	BANBURY 161	CARBON BLACK	REGISTRATION
PD 71	PELLET HANDLING & STORAGE	SOAPSTONE POWDER	10-21-83
PD 72			
PD 73			
PD 74	CARBON BLACK SYSTEM	CARBON BLACK	10-21-83
PD 75	FLAP PRESSES	1	REGISTRATION
PD 77	CURING OVEN	.	REGISTRATION
PD 78	NO 73 STOCK MIXING UNIT	11	REGISTRATION
PD 79	STEEL CORD CALENDER		REGISTRATION
PD 81	TIRE GRINDER	RUBBER DUST	REGISTRATION
PD 84	BLEMISH PAINT MACHINE		4-10-83
PD 88	161 BANBURY/ PIGMENT WEIGHING	PIGMENT DUST	





<b>FORM</b>	<b>1</b>	<b>EPA</b>	<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b>	<b>GENERAL INFORMATION</b>	<b>I. EPA I.D. NUMBER</b>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:10%;">F</td> <td style="width:10%;">O</td> <td style="width:10%;">H</td> <td style="width:10%;">D</td> <td style="width:10%;">0</td> <td style="width:10%;">0</td> <td style="width:10%;">4</td> <td style="width:10%;">3</td> <td style="width:10%;">4</td> <td style="width:10%;">3</td> <td style="width:10%;">1</td> <td style="width:10%;">1</td> <td style="width:10%;">7</td> <td style="width:10%;">3</td> <td style="width:10%;">D</td> </tr> <tr> <td colspan="13"></td> <td style="text-align: center;">13</td> <td style="text-align: center;">14</td> <td style="text-align: center;">15</td> </tr> </table>	F	O	H	D	0	0	4	3	4	3	1	1	7	3	D														13	14	15
F	O	H	D	0	0	4	3	4	3	1	1	7	3	D																							
													13	14	15																						
<b>Consolidated Permits Program</b> (Read the "General Instructions" before starting.)						<b>GENERAL INSTRUCTIONS</b>																															
<b>II. POLLUTANT CHARACTERISTICS</b> <b>INSTRUCTIONS:</b> Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.						If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.																															
<b>III. FACILITY NAME</b> SHELL OIL COMPANY <b>VI. FACILITY LOCATION</b> 2382 WASHINGTON BLVD BELPRE, OH 45714						<b>GENERAL INSTRUCTIONS</b> If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.																															

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

<b>III. NAME OF FACILITY</b>	
1	SKIP SHELL CHEMICAL COMPANY

<b>IV. FACILITY CONTACT</b>	
<b>A. NAME &amp; TITLE (last, first, &amp; title)</b>	<b>B. PHONE (area code &amp; no.)</b>
2 CC DUFFIELD	614 423 7571

<b>V. FACILITY MAILING ADDRESS</b>	
<b>A. STREET OR P.O. BOX</b>	
3 P O BOX 235	
<b>B. CITY OR TOWN</b>	<b>C. STATE</b> <b>D. ZIP CODE</b>
4	40 21 42 47 51

<b>VI. FACILITY LOCATION</b>	
<b>A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER</b>	
5	
<b>B. COUNTY NAME</b>	
BELMONT	
<b>C. CITY OR TOWN</b>	<b>D. STATE</b> <b>E. ZIP CODE</b> <b>F. COUNTY CODE (if known)</b>
6	40 51 42 47 51 52 54 013 OP

CONTINUED FROM THE FRONT

II. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
(specify)				(specify)			
2 8 2 1 POLYSTYRENE				7 2 8 2 2 SYNTHETIC SPECIALTY POLYMERS			
C. THIRD				D. FOURTH			
(specify)				(specify)			
3 0 7 9 COMP'D SYNTHETIC SPECIALTY POLYMERS							

III. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?	
SHELL CHEMICAL COMPANY												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)			
F = FEDERAL S = STATE P = PRIVATE										M = PUBLIC (other than federal or state) O = OTHER (specify)			
P										PRIVATE			
E. STREET OR P.O. BOX													
P O BOX 235													
F. CITY OR TOWN						G. STATE		H. ZIP CODE		IX. INDIAN LAND			
B E L P R E						O H		4 5 7 1 4		Is the facility located on Indian lands?			
										<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			

C. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
F 0 0 8 * B D										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
U										0 6 8 4 0 1 0 0 1 1 (specify) OHIO EPA PERMIT TO OPERATE									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
O H D 0 0 4 3 4 3 1 1 7										(specify)									

(I. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

THE MANUFACTURER OF:

- POLYSTYRENE - A POLYMER PRODUCED BY THE REACTION OF STYRENE AND POLYBUTADIENE.
- KRATON D AND G - ELASTOMERS PRODUCED BY THE REACTION OF STYRENE AND BUTADIENE (OR ISOPREN) INCLUDING A HYDROGENATION STEP FOR THE G ELASTOMER.
- COMPOUNDED SPECIALTY POLYMERS - PRODUCTS OBTAINED BY MIXING AND FLUXING THE ELASTOMERS WITH FILLERS AND OTHER INGREDIENTS.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
R. J. O'BRIEN VICE-PRESIDENT, OPERATIONS				11/18/80	

COMMENTS FOR OFFICIAL USE ONLY

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FORM 3510-3		EPA		ENVIRONMENTAL PROTECTION AGENCY		HAZARDOUS WASTE PERMIT APPLICATION		Consolidated Permits Program		I. EPA I.D. NUMBER																																																																									
RCRA						(This information is required under Section 3005 of RCRA.)				F O H D 0 0 4 3 4 3 1 1 7 3 1																																																																									
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EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.																																																																																			
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**II. PROCESSES (continued)**

1. SPACE FOR ADDITIONAL PROCESS CODES OR  
INCLUDE DESIGN CAPACITY.

OR DESCRIBING OTHER PROCESSES (code "T0")

FOR EACH PROCESS ENTERED HERE

**IV. DESCRIPTION OF HAZARDOUS WASTES**

**EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**1. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**2. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE      CODE  
POUNDS . . . . . P  
TONS . . . . . T

METRIC UNIT OF MEASURE      CODE  
KILOGRAMS . . . . . K  
METRIC TONS . . . . . M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**1. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NUMBER	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing. Have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

320

EPA ID. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY									
<div style="display: flex; justify-content: space-between;"> <span>W O H D 0 0 4 3 4 3 1 1 7 3 1</span> <span>T/A C</span> </div>															<div style="display: flex; justify-content: space-between;"> <span>W</span> <span>DUP</span> <span>T/A C</span> <span>DUP</span> </div>									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																								
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																	
							1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))									
	23	24	25	26		36	27	28	29	27	28	29	27	28	29	27	28	29						
1	U	2	1	3	11 000	T	S	0	1															
2	U	2	2	0															INCLUDED IN ABOVE					
3	D	0	0	1															INCLUDED IN ABOVE					
4	U	0	5	6	40 000	T	S	0	1															
5	U	2	2	0	41 000	T	S	0	1															
6	D	0	0	1															INCLUDED IN ABOVE					
7	U	0	5	6	35 000	T	S	0	1															
8	D	0	0	1															INCLUDED IN ABOVE					
9	U	0	5	6	40 000	T	S	0	2															
10	D	0	0	1															INCLUDED IN ABOVE					
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V. DESCRIPTION OF HAZARDOUS WASTE

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)											
1	2	3	4	5	6	7	8	9	10	11	12
0	H	D	0	0	4	3	4	3	1	1	7
										T/A	C
										3	6

VI. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6A/55

VII. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6A/56

VIII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

39 16 05 50 500

81 08 38 05 150

IX. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

\*See attached note below for interpretation.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

R. J. O'BRIEN  
VICE-PRESIDENT OPERATIONS

*R. J. O'Brien*

11/18/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

\*See attached note below for interpretation.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

R. J. O'BRIEN  
VICE-PRESIDENT OPERATIONS

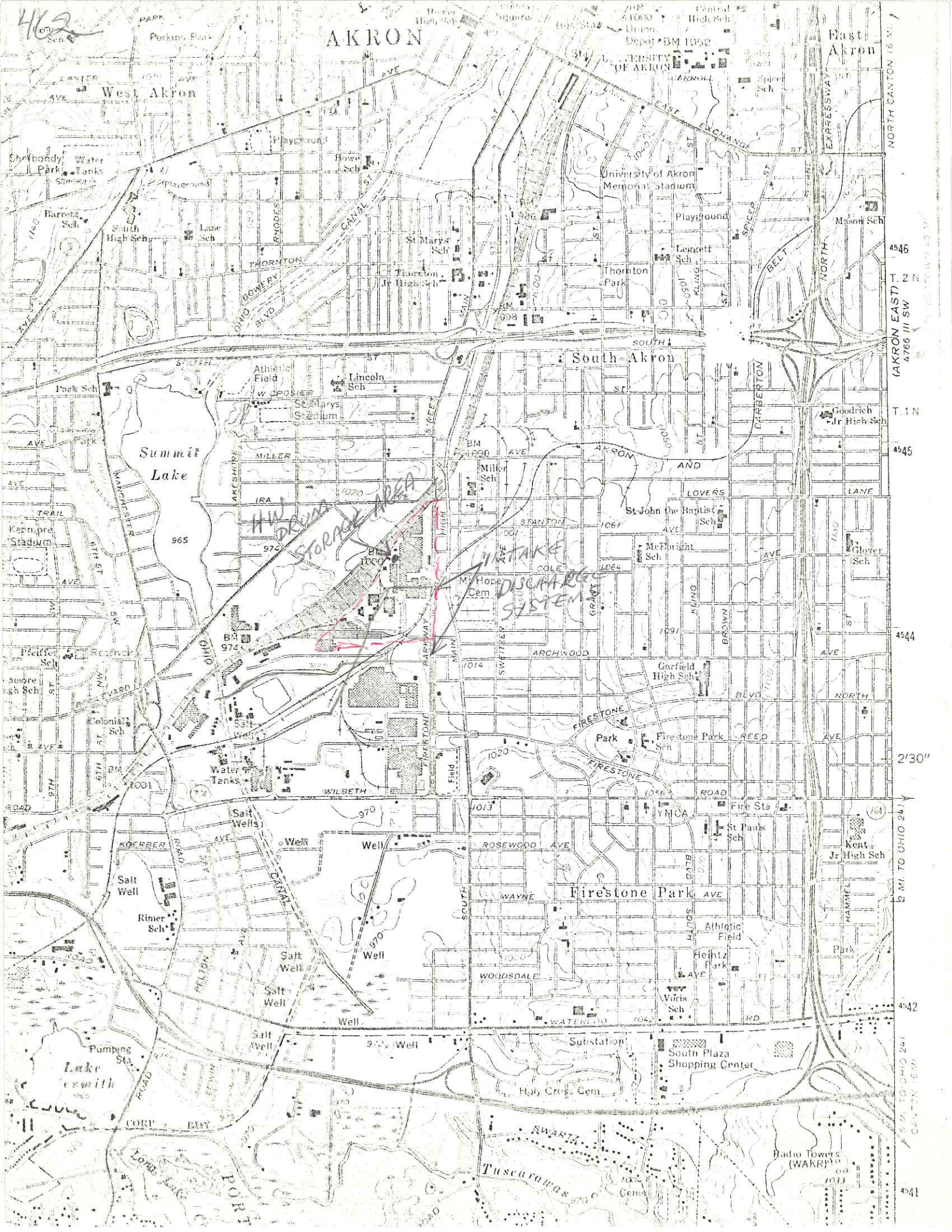
*R. J. O'Brien*

11/18/80



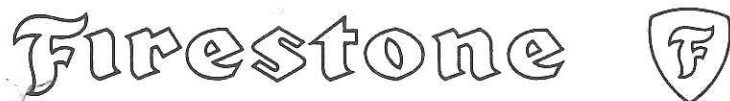
## AKRON

East  
Akron









August 12, 1980

U.S. EPA  
Region V  
RCRA Activities  
P.O. Box 7861  
Chicago, IL 60680

Gentlemen:

Enclosed are two EPA form 8700-12 for the Firestone Central Research Division. Please issue the required generator numbers.

Yours truly,

CENTRAL RESEARCH LABORATORIES

T. E. Anderson  
Administrative Scientist

TEA:djt

04 D001288109  
0HT400012118

#### A.4 Closure/Post- Closure



State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049  
(614) 466-8565



Richard F. Celeste, Governor

August 13, 1986

Re: Firestone Tire & Rubber Co.  
US EPA ID No.: OHD001288109  
Ohio I.D. No.: 02-77-0325  
Closure Plan

RECEIVED

AUG 18 1986

U.S. EPA, REGION V

Firestone Tire & Rubber Co.  
Attn: David C. McMillen  
1200 Firestone Parkway  
Akron, Ohio 44317

Dear Sir:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for Firestone Tire & Rubber Company in Akron, Ohio will appear the week of August 17, 1986, in the Akron Beacon Journal in Akron, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, September 19, 1986.

Copies of the closure plan will be available for public review at the Akron-Summit County Public Library, 55 S. Main Street, Akron, Ohio 44326 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

Please contact James F. Flautt at (614) 466-1578, if you have any questions concerning this matter.

Very truly yours,

*Thomas E. Crepeau*

Thomas E. Crepeau  
Division of Solid & Hazardous Waste Management

TEC/dhs

cc: George Hamper, U.S. EPA, Region V  
Rebecca Strom, U.S. EPA, Region V  
Jennie Tuckerman, OEPA, NEDO

1013R



PUBLIC NOTICE

Summit County

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: Firestone Tire & Rubber Company, US EPA ID No.: OHD001288109, Ohio ID No: 02-77-0325, 1200 Firestone Parkway, Akron, Ohio 44137. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Akron-Summit County Public Library, 55 S. Main Street, Akron, Ohio 44326 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Attn: Data Management Section, Box 1049, 361 E. Broad Street, Columbus, Ohio 43216-1049.

# OhioEPA Inter-Office Communication

TO: Dan Fisher, TA & WMS, DSHWM

DATE: August 11, 1986

FROM: Jennie Tuckerman, NEDO, DSHWM

SUBJECT: Firestone World Headquarters Facility, #02-77-0325, OHD 001-288-109

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The attached Closure Plan is substantially complete. I recommend approval by the Director of the Ohio EPA.

JT/sp

Attachment

cc: Rebecca Strom, U.S. EPA, Region V  
Ken Chiu, U.S. EPA, Region V  
Jim Flautt, DSHWM, Central Office

RECEIVED  
AUG 14 1986  
SOLID WASTE DIVISION  
U.S. EPA REGION V



TO MEMORANDUM

FROM D. C. MC MILLEN

DATE AUGUST 11, 1986

SUBJECT AKRON WORLD HEADQUARTERS FACILITY USEPA ID #OHDO01288109  
SUB PART G. CLOSURE AND POST CLOSURE - (OAC-3745-55-11 TO 15) AND  
PERMIT #02-77-0325 (OAC-3745-55-17 TO 20)

Present permitted storage facility is of concrete construction, 20 ft. X 10 ft. in size. The design of construction is monolithic, (single pour) as footer, pad, dike walls and ramps were poured at the same time, to eliminate any joints.

Footer at base of pad is approximately 4 ft. deep and dike walls are 8 inches thick by 8 inches high, with an 8 inch thick pad. Wire mesh and re-bar were used for reinforcement. The storage pad is located South West of our World Headquarters Building and the surrounding area is asphalt pavement.

Location of the hazardous waste storage facility is indicated on the attached topographic map and also on the Firestone drawing AKC 33001-3 also attached. Drawing WHB 21003-1 (attached) shows the construction of the storage pad.

The reason for closing our permitted storage facility is that we no longer produce tires and rubber products in our World Headquarters Building and consequently do not generate enough hazardous waste to warrant keeping a permitted facility.

Our Akron, Ohio, World Headquarters Facility is primarily a Corporate Office Building with Laboratories and Work Shops for the development of rubber compounds and tire related machinery.

After closure we will operate as a generator and comply with regulations pertaining to a generator and comply with the less than 90 day requirements.

#### Description of Wastes

D-001 - Wastes are mixtures of rubber solvents and cements. The constituents being gasoline and blended hydrocarbon solvents.

F-001/F-002 - Mixtures of halogenated solvents, which are 1, 1, 1, -tri chloroethane, methylene chloride, chloroform and ortho-dichloro benzene.

F-003 - Mixtures of non-halogenated solvents, which are xylene, acetone and methanol.

F-004 - Mixtures of non-halogenated solvents which are cresol and cresylic acid.

F-005 - Mixtures of non-halogenated solvents which are toluene and methyl ethyl ketone.

The anticipated amount of waste in storage at closure would be one 55 gallon drum or 55 gallons, which would be a mixture of all above wastes. Percentages would be estimated as D-001 - 60%, F-001 - 05%, F-002 - 05%, F-003 - 10%, F-004 - 15%, and F-005 - 05%.

The time table after receiving approval for effecting our closure would be as follows:

Within 20 days after approval, waste will be disposed of off site.

Within 60 days after approval, storage pad will be decontaminated. Rinsate will have been sampled and disposed of properly.

Within 90 days after approval, certification by Firestone professional engineer and independant professional engineer would be forwarded to O.E.P.A.

Details of closure are as follows:

1 - Disposal of wastes remaining in storage by day 20.

Transportation	=	\$	300.00
Disposal	=		200.00

2 - Decontamination of concrete slab.

- Pressure wash with detergent (trade name Dun-E-Z) drum first rinsate as a hazardous waste.

- Pressure wash with detergent a second time and drum rinsate. Wadsworth Alert, Inc. will sample and analyze second rinse. If less than 1 MG/L of any R.C.R.A. regulated solvent is achieved, slab will be considered clean, if not, process will be repeated until less than 1 MG/L is attained. Rinsate will be properly disposed of after analysis.

Rubber boots, rubber gloves, face shields and disposable coveralls would be used by employees during decontamination process, and properly disposed of after use. Equipment would be decontaminated by hand washing, after decontamination process is complete, and wash material properly disposed of as a hazardous waste.

Decontamination	=	\$	2,500.00
Transportation of			
rinsate	=		400.00
Disposal of rinsate	=		600.00

3 - Wadsworth Alert - sample and analyze = \$1,000.00

Recommended procedures for testing are per attached analytical method list by Wadsworth Alert Laboratories, Inc. The parameters listed are the previously stored wastes. The matrix being our rinsate. By day 60.

4 - Woodward-Clyde Consultants will supervise the decontamination process and furnish closure certification. = \$3,000.00

Certification by Firestone professional engineer and independent professional engineer to be forwarded to O.E.P.A. by day 90.

Post closure care would not apply due to the fact that no hazardous waste would remain.

*D.C. McMillen*

COORDINATOR, HAZARDOUS WASTE  
WHQ MAINTENANCE

DCM:jkj  
Attachment

# FIRESTONE WORLD HEADQUARTERS CLOSURE SCHEDULE

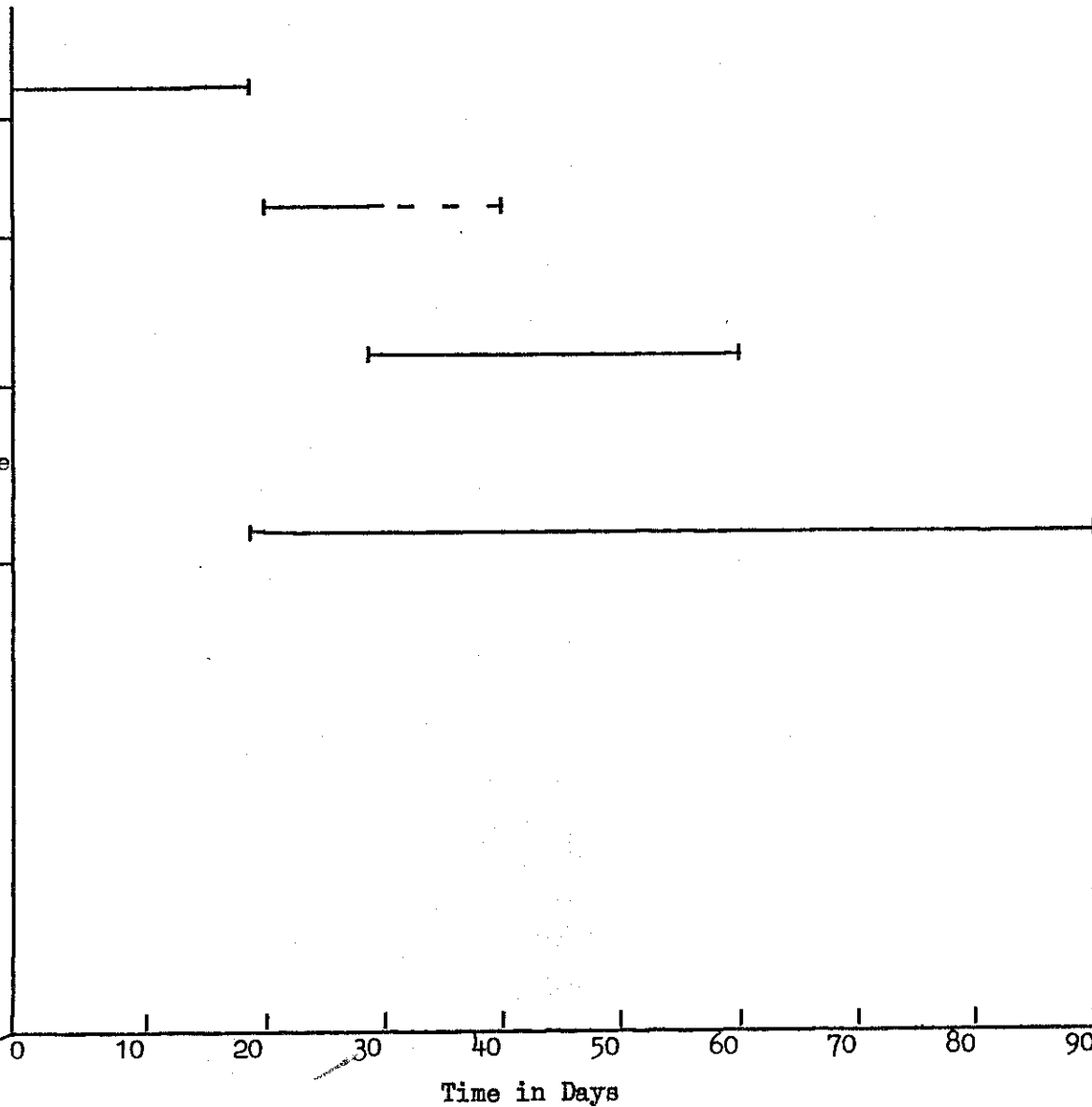
## Task

1 - Removal, transportation  
and disposal of  
remaining waste

2 - Decontamination of  
storage facility

3 - Sample and analyze  
rinsate - transportation  
and disposal of rinsates

4 - Supervision and  
certification by Firestone  
and independant profess-  
ional engineers



Date of Approval





3004

AKC-33005

HAZARDOUS WASTE  
STORAGE PAD

POWER  
HOUSE

BURGER IRON CO.

PLANT ONE

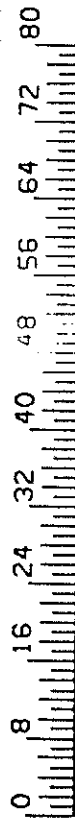
SHIPPING  
BUILDING

LABOR

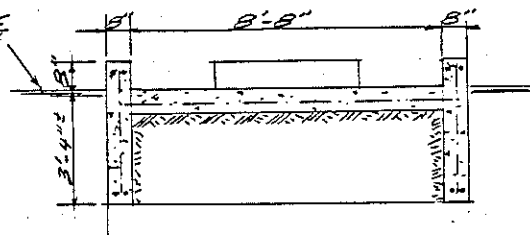
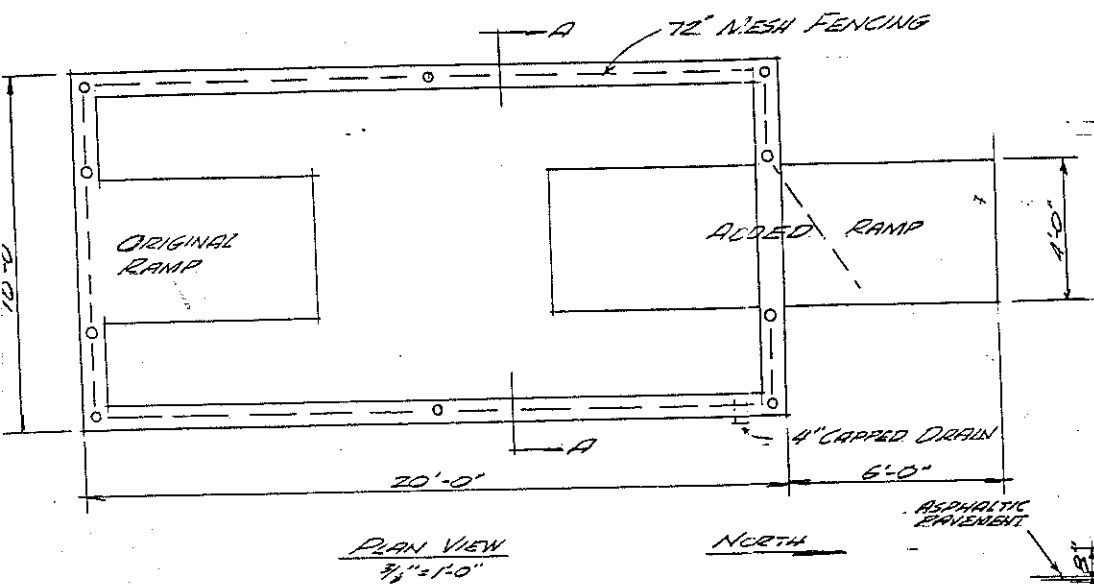
CLUB  
HOUSE

SOUTH MAIN STREET

SCALE : 200 : 1



780-A-AKC-33001 | 3 |



- NOTES:
1. PLACEMENT OF CONCRETE BY CONTINUOUS METHOD TO AVOID JOINTS.
  2. REINFORCING USED WAS WIRE MESH.

SECTION AA  
 $\frac{3}{4}'' = 1'-0''$   
 CONCRETE PAD FOR  
 HAZARDOUS WASTE DRUMS

REV. BY CWR DATE 7/21/88  
 REDRAWN PER  
 FIELD MEAS./  
 DISCUSSION WITH

This Drawing is the property of  
 The Firestone Tire & Rubber Co.  
 This drawing is loaned on the express condition that it is not to be used in any  
 way deleterious to the interests of The Firestone Tire & Rubber Company.  
 The acceptance of this drawing will be construed as an acceptance of the fore-  
 said condition and as an admission of the exclusive ownership in and to the  
 Firestone Tire & Rubber Company.

THE Firestone TIRE & RUBBER CO.

DRAWN <u>CWR</u>	APPROVED _____	DATE <u>7/21/88</u>
CHECKED _____	PROJ. ENG. _____	SCALE <u>3/4\"/&gt;</u>
PLANT	SIZE	DEPT.
<u>MDR</u>	<u>R</u>	<u>MDR 21003</u>



WADSWORTH/ALERT  
LABORATORIES, INC.

ANALYTICAL METHOD LIST

<u>Matrix</u>	<u>Parameter</u>	<u>Method</u>
Wastewater	Methanol	NIOSH S59, modified
	1,1,1-Trichloroethane	SW846 Method 8240
	Methylene Chloride	SW846 Method 8240
	Chloroform	SW846 Method 8248
	1,2-Dichlorobenzene	SW846 Method 8240
	Xylenes	SW846 Method 8240
	Toluene	SW846 Method 8240
	Acetone	SW846 Method 8240
	2-Butanone	SW846 Method 8240
	Gasoline as BTX	SW846 Method 8240
	ortho-Cresol	SW846 Method 8270
	meta-Cresol	SW846 Method 8270
	para-Cresol	SW846 Method 8270
	Cresylic Acid	SW846 Method 8270



State Of Ohio Environmental Protection Agency

Northeast District Office  
2110 E. Aurora Road; Twinsburg, Ohio 44087-1969

(216) 425-9171



Richard F. Celeste, Governor

June 30, 1986

RE: FIRESTONE TIRE & RUBBER CO.  
SUMMIT COUNTY  
OHD 001-288-109  
#02-77-0325  
G-TSD

Mr. D.C. McMillen  
Firestone Tire and Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44317

RECEIVED

JUL 11 1986

Dear Mr. McMillen:

SOLID WASTE BRANCH  
U.S. EPA, REGION V

This letter is written in response to the submittal of a Closure Plan for your drum storage area. The Closure Plan must address and comply with all applicable closure regulations and meet the closure performance standard. In addition, the Closure Plan must be Public Noticed.

Your Closure Plan has been reviewed and has been found to be incomplete. The following areas need to be addressed in your plan:

1. The Closure Plan should include the reason for closing the permitted area. The plan should state that the facility will be operated under less than 90 day storage requirements after closure.
2. A general description of the facility needs to be included in the plan. The description should cover the type of industry, type of products manufactured, facility location, types of hazardous wastes generated and method of storage for those wastes.
3. A map of the facility location and detailed drawings of the facility and storage area should be included in the plan. All drawings and maps must show scale measurement.
4. The construction materials of the storage slab and surrounding area should be described in the plan.
5. A complete, detailed list of hazardous wastes (chemical name and EPA hazardous waste number) must be provided in the plan for those wastes presently and previously stored in the storage area. An estimate of maximum hazardous waste inventory, in gallons, at closure must also be included.
6. The plan should contain a time table which shows all critical dates for closure such as waste removal and sampling.
7. Please indicate what measures will be used to protect personnel involved in the closure.



Mr. D.C. McMillen  
June 30, 1986  
Page 2

8. All efforts to clean or decontaminate waste residues from the storage area need to be described fully in the plan. Please identify the material that will be used to clean and rinse the concrete slab.
9. It is Ohio EPA policy that no more than 1 mg/l of an RCRA regulated solvent should remain in a rinseate before the slab could be considered "clean". This "clean" level must be stated in your plan. Please identify what parameters will be sampled for in the rinse water and the rationale for their selection.
10. A description of decontamination procedures for any equipment used during closure activities should be included in the plan.
11. Costs should be broken down into the following categories: labor, sampling, analytical work, equipment rental, and disposal cost per drum.

The Closure Plan should be revised and resubmitted within 30 days of receipt of this letter. A Closure Plan content guidance document is enclosed to help you in revising your plan. Should you have any questions feel free to call me at (216) 425-9171.

Sincerely,

Jennie J. Tuckerman  
Environmental Scientist  
Division of Solid and Hazardous Waste Management

JJT/sp

Enclosure

cc: Dan Fisher, DSHWM, Central Office  
Ken Chiu, U.S. EPA-Region V  
Rebecca Strom, U.S. EPA-Region V

February 21, 1986

RECEIVED

MAR 07 1986

OHIO EPA-N.E.D.O.

Ms. Jennie Tuckerman  
Ohio Environmental Protection Agency  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087

Dear Ms. Tuckerman:

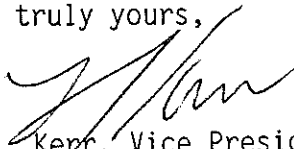
We have evaluated our quantities of waste generated and have concluded that we no longer have need for our storage facility.

We are at this time submitting our Facility Closure Plan for your review and request your approval for Closure.

This Closure Plan is consistent with previous documentation which covered the event a decision is reached to close our Hazardous Waste Storage Facility. Reference attached letter dated December 12 which was included in previous correspondence to State covering our permits.

We would like to withdraw our interim status Permit No. 02-77-0325 and remain a generator only. Contact person for this Closure would be D. C. McMillen, Coordinator, Hazardous Waste, (216) 379-7350.

Very truly yours,

  
L. J. Kepp, Vice President  
Manufacturing Engineering  
World Tire Group

REJ:mav

cc: V. V. Adamkas - US EPA Region V  
R. W. Chambers - Manager, WHQ Building Projects & Services  
T. E. Crepeau - Ohio EPA  
R. E. Jereb - R.C.R.A. Consultant  
J. R. Laman - Corporate Environmental Affairs  
D. C. McMillen - Coordinator, Hazardous Waste  
A. V. Natoli - Risk Management  
W. L. Poling - Manager, WHQ Maintenance

RECEIVED

MAR 07 1986

OHIO EPA-N.E.D.O.



TO MR. A. V. NATOLI  
RISK MANAGEMENT DEPARTMENT

FROM D. C. McMILLEN

DATE DECEMBER 12, 1985

SUBJECT AKRON WORLD HEADQUARTERS FACILITY USEPA ID #OHDO01288109  
SUB PART G. CLOSURE AND POST CLOSURE - (OAC-3745-55-11 TO 15) AND  
(OAC-3745-55-17 TO 20)

The Firestone World Headquarters Building facility will remain as long as there is a need to store hazardous waste. If the quantity of hazardous waste would decrease significantly, the site might possibly be used as an accumulation area only. There would be a maximum of eighteen (18) 55-gallon drums in storage at any given time, namely D-001, F-001, F-002, F-003, F-004 and F-005. There is no anticipated closure date available.

If for some unanticipated reason a closure would be required, the following steps would be followed. The Closure Plan would be submitted to the Ohio EPA 180 days prior to closure for approval.

1. Disposal of all hazardous waste in the storage area to a proper disposal site within 90 days of last receipt after receiving approval from Ohio EPA.

Transportation and Disposal = \$ 4,500.00

2. Clean-up of slab, removal of fence and concrete slab, if deemed necessary.

(A) Rinse down to decontaminate	2,500.00
(B) Sample and analyze second rinse	350.00
(C) Drum and dispose of all rinse material	700.00
(D) Demolition of fence and slab if deemed necessary	4,000.00

3. Hire independent registered professional engineer to certify that the facility has been properly closed. 3,500.00

Total Closure Cost \$ 15,550.00

The Closure would be complete 180 days after receiving approval from Ohio EPA. Certification by Firestone Professional Engineer and Independent Professional Engineer will be forwarded at that time. Post Closure care would not apply due to the fact that we are strictly a storage facility and, therefore, no hazardous wastes would remain.

*D.C. McMillen*

D. C. McMILLEN  
COORDINATOR, HAZARDOUS WASTE  
WORLD HEADQUARTERS MAINTENANCE DEPARTMENT

cc: Messrs. J. R. Laman, A. H. King, Jr., W. L. Poling

RECEIVED  
MAR 07 1986  
OHIO EPA-N.E.D.O.

# CLOSURE PLAN

1. Disposal of all hazardous waste in the storage area to a proper disposal site within 90 days of last receipt after receiving approval from Ohio EPA.

Transportation and Disposal = \$ 4,500.00

2. Clean-up of slab, removal of fence and concrete slab, if deemed necessary.

(A) Rinse down to decontaminate	2,500.00
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3. Hire independent registered professional engineer to certify that the facility has been properly cleaned. 3,500.00

Total Closure Cost \$ 15,550.00

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Post Closure care would not apply due to the fact that we are strictly a storage facility and, therefore, no hazardous wastes would remain.

02-21-86

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE:

7/11

SUBJECT:

Installation Name

Firestone Tire & Rubber Co

Installation Address

1200 Firestone Parkway

EPA ID#

OHD 001 288 109

FROM:

Oretha Edwards, AIS

TO:

Technical Programs Section, OHD Unit

Attention:

Rebecca Strom

Attached for your review is a copy of

Closure plan letters

for the above-referenced facility. PLEASE RETURN THIS FORM ALONG WITH ALL ATTACHED MATERIAL TO ME FOR FORWARDING TO AIS STAFF OR TO FILE.

Cover letter date

6/30

Rec'd in Region

7/11

Rec'd in AIS

7/11

Copy sent to

ACTION REQUIRED

REVIEWER'S SUMMARY

PLEASE RETURN THIS FORM ALONG WITH ALL RELATED MATERIAL TO ORETHA EDWARDS, AIS





# ROUTE SLIP

Date 7-9-86

7 545-13  
Rebecca Strom Permits-Ohio  
FROM Jennie Tuckerman Ohio EPA  
SUBJECT Closure Plan Letters

PURPOSE	<input type="checkbox"/> Circulate To	Initial	Date
<input type="checkbox"/> Action _____			
<input type="checkbox"/> Approval _____			
<input type="checkbox"/> As Requested _____			
<input type="checkbox"/> Comment _____			
<input type="checkbox"/> Information _____			
<input type="checkbox"/> File _____			
<input type="checkbox"/> For Follow up on _____			
<input type="checkbox"/> Reply <input type="checkbox"/> Direct <input type="checkbox"/> From me			
<input type="checkbox"/> Return to _____			
<input type="checkbox"/> See me _____			
<input type="checkbox"/> Signature _____			
<input type="checkbox"/> Other - See Remarks			

REMARKS Enclosed are copies of  
three letters regarding the  
review of closure plans for

drum storage areas.  
The submitted closure  
Plans are attached  
to each letter.

Thanks,  
Jennie Tuckerman



TELEX NO.: 98-64-31  
CABLE ADDRESS: FIRESTONE, AKRON (OHIO).  
US EPA ID NO. OHD001288109  
PERMIT NO. 02-77-0325

April 1, 1986

REGISTERED MAIL - RETURN RECEIPT REQUESTED

Ms. Lisa Pierard  
U.S. EPA, Region V  
RCRA Activities  
P.O. Box A3587  
Chicago, IL 60690

RECEIVED

APR 11 1986

SWD - AIS  
U.S. EPA, REGION V

Dear Ms. Pierard:

Permit and Closure Information

We have evaluated our quantities of waste generated and have concluded that we no longer have need for our storage facility, as we no longer manufacture tires and rubber at this address.

We are at this time submitting our Facility Closure Plan for your review and request your approval for closure. We anticipate closure to be completed within 90 days after receiving approval.

This Closure Plan is consistent with previous documentation which covered the event a decision is reached to close our Hazardous Waste Storage Facility. Reference attached letter dated December 12 which was included in previous correspondence to State covering our permits.

We would like to withdraw our interim status Permit No. 02-77-0325 and remain a generator only. Contact person for this closure would be D. C. McMillen, Coordinator, Hazardous Waste, (216) 379-7350.

Very truly yours,

D. L. King, Vice President  
U.S. Tire Operations

REJ:mav

Enclosures

cc: R. W. Chambers - Manager, WHQ Building Projects & Services  
R. E. Jereb - R.C.R.A. Consultant  
J. R. Laman - Corporate Environmental Affairs  
D. C. McMillen - Coordinator, Hazardous Waste  
A. V. Natoli - Risk Management  
W. L. Poling - Manager, WHQ Maintenance



TO MR. A. V. NATOLI  
RISK MANAGEMENT DEPARTMENT

FROM D. C. McMILLEN

DATE DECEMBER 12, 1985

SUBJECT AKRON WORLD HEADQUARTERS FACILITY USEPA ID #OHDO01288109  
SUB PART G. CLOSURE AND POST CLOSURE - (OAC-3745-55-11 TO 15) AND  
(OAC-3745-55-17 TO 20)

The Firestone World Headquarters Building facility will remain as long as there is a need to store hazardous waste. If the quantity of hazardous waste would decrease significantly, the site might possibly be used as an accumulation area only. There would be a maximum of eighteen (18) 55-gallon drums in storage at any given time, namely D-001, F-001, F-002, F-003, F-004 and F-005. There is no anticipated closure date available.

If for some unanticipated reason a closure would be required, the following steps would be followed. The Closure Plan would be submitted to the Ohio EPA 180 days prior to closure for approval.

1. Disposal of all hazardous waste in the storage area to a proper disposal site within 90 days of last receipt after receiving approval from Ohio EPA.  
Transportation and Disposal = \$ 4,500.00
2. Clean-up of slab, removal of fence and concrete slab, if deemed necessary.
  - (A) Rinse down to decontaminate 2,500.00
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  - (C) Drum and dispose of all rinse material 700.00
  - (D) Demolition of fence and slab if deemed necessary 4,000.00
3. Hire independent registered professional engineer to certify that the facility has been properly closed. 3,500.00  
Total Closure Cost \$ 15,550.00

The Closure would be complete 180 days after receiving approval from Ohio EPA. Certification by Firestone Professional Engineer and Independent Professional Engineer will be forwarded at that time. Post Closure care would not apply due to the fact that we are strictly a storage facility and, therefore, no hazardous wastes would remain.

*D.C. McMillen*  
D. C. McMILLEN  
COORDINATOR, HAZARDOUS WASTE  
WORLD HEADQUARTERS MAINTENANCE DEPARTMENT

cc: Messrs. J. R. Laman, A. H. King, Jr., W. L. Poling

The generic description of wastes stored in our facility in the past, from non-specific sources, were as follows:

F-001 and F-002 mixtures of halogenated solvents, such as 1, 1, 1, - tri-chloroethane, methylene chloride, chloroform and ortho-dicholorbenzene

F-003 mixtures of non-halogenated solvents such as xylene, acetone and methanol

F004 mixtures of non-halogenated solvents such as cresols and cresylic acids

F005 mixtures of non-halogenated solvents such as toluene and methyl ethyl ketone



# Firestone

US EPA ID NO. OHD001288109  
PERMIT NO. 02-77-0325

RECEIVED

February 21, 1986

MAR 12 1986

SWB - HIS  
U.S. EPA, REGION V

RECEIVED

MAR 11 1986

SOLID WASTE DIVISION  
U.S. EPA, REGION V

Ms. Jennie Tuckerman  
Ohio Environmental Protection Agency  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087

Dear Ms. Tuckerman:

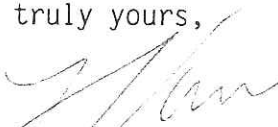
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Very truly yours,

  
L. J. Kerr, Vice President  
Manufacturing Engineering  
World Tire Group

REJ:mav

cc: V. V. Adamkas - US EPA Region V  
R. W. Chambers - Manager, WHQ Building Projects & Services  
T. E. Crepeau - Ohio EPA  
R. E. Jereb - R.C.R.A. Consultant  
J. R. Laman - Corporate Environmental Affairs  
D. C. McMillen - Coordinator, Hazardous Waste  
A. V. Natoli - Risk Management  
W. L. Poling - Manager, WHQ Maintenance

O. WMD  
CC: RF  
LITTLE } CERT-ROUTINE

## CLOSURE PLAN

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3. Hire independent registered professional engineer to certify that the facility has been properly cleaned. 3,500.00

---

Total Closure Cost \$ 15,550.00

The Closure would be complete 180 days after receiving approval from Ohio EPA. Certification by Firestone Professional Engineer and Independent Professional Engineer will be forwarded at that time.

Post Closure care would not apply due to the fact that we are strictly a storage facility and, therefore, no hazardous wastes would remain.



TO MR. A. V. NATOLI  
RISK MANAGEMENT DEPARTMENT

FROM D. C. McMILLEN

DATE DECEMBER 12, 1985

SUBJECT AKRON WORLD HEADQUARTERS FACILITY USEPA ID #OHDOOL288109  
SUB PART G. CLOSURE AND POST CLOSURE - (OAC-3745-55-11 TO 15) AND  
(OAC-3745-55-17 TO 20)

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*D.C. McMillen*  
D. C. McMILLEN  
COORDINATOR, HAZARDOUS WASTE  
WORLD HEADQUARTERS MAINTENANCE DEPARTMENT

cc: Messrs. J. R. Laman, A. H. King, Jr., W. L. Poling



1230 W. Peachtree St., N. W.  
P. O. Box 4985  
Atlanta, Georgia 30302  
(404) 875-9641  
Telex 54-2445  
TWX 810 751-3329

February 28, 1983

**Mike Rogers**  
Vice President

Mr. Valdas Adamkus  
Regional Administrator  
Environmental Protection Agency - Region V  
230 South Dearborn Street  
Chicago, IL 60604

**RECEIVED**  
MAR 02 1983  
WASTE MANAGEMENT  
BRANCH

Dear Mr. Adamkus:

The Firestone Tire & Rubber Co.  
Hazardous Waste Facility  
Certificates of Insurance

The attached Hazardous Waste Facility Certificate of Insurance replaces the certificate previously sent to you on February 15, 1983.

Please accept our apologies for any inconvenience this may have caused.

Sincerely,



Mike Rogers

MR/pp  
Attachment

cc: Mr. Jack F. Bauer/Johnson & Higgins of Ohio, Inc.



HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. The International Insurance Company of Chicago, Illinois hereby certifies that it has issued liability insurance covering bodily injury and property damage to THE FIRESTONE TIRE & RUBBER CO. of 1200 FIRESTONE PARKWAY, AKRON, OH 44317 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at 1) Firestone Tire & Rubber Company, 2500 North 22nd Street, Decatur, IL 62525 - EPA Identification No. ILD 005199013; 2) Electric Wheel Corporation, 1120 No. 38th Street, Quincy, IL 62301; EPA Identification No. ILD 006273346

for non-sudden accidental occurrences.

The limits of liability are \$ 3,000,000. each occurrence and \$ 6,000,000. annual aggregate exclusive of legal defense costs. The coverage provided under policy number 560-000-200 issued on January 10, 1983. The effective date of said policy is January 10, 1983.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by the Manager of the Division of Land & Noise Pollution Control, Environmental Protection Agency, the Insurer agrees to furnish to the Manager a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Manager of the Division of Land & Noise Pollution Control, Environmental Protection Agency in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Manager of the Division of Land & Noise Pollution Control, Environmental Protection Agency in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j), except for the substitution of Division of Land & Noise Pollution Control, Environmental Protection Agency as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

*Frank Kinnett*

Frank Kinnett - Vice President  
(Authorized Representative)

International Insurance Company  
% The London Agency, Inc.

P. O. Box 4985, Atlanta, GA 30302

CERTIFICATE ISSUED TO:

Mr. Valdas Adamkus, Regional Administrator

Environmental Protection Agency - Region 5

230 South Dearborn Street

Chicago, IL 60604



HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. The International Insurance Company of Chicago, Illinois hereby certifies that it has issued liability insurance covering bodily injury and property damage to THE FIRESTONE TIRE & RUBBER CO.  
of 1200 FIRESTONE PARKWAY, AKRON, OH 44317  
in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at 1) Firestone Tire & Rubber Co., Akron World Headquarters, 1200 Firestone Pkwy., Akron, OH 44317 - EPA ID# OHD001288109  
2) Firestone Tire & Rubber Co., Akron Research Pilot Plant, 381 Wilbeth Road, Akron, OH 44301 - EPA ID# OHT 400012118; 3) Firestone Steel Products Co., Akron Steel Products Plant, 1600 Firestone Pkwy., Akron, OH 44301 - EPA ID# OHD 087234647 ✓  
for non-sudden accidental occurrences.

The limits of liability are \$ 3,000,000. each occurrence and \$ 6,000,000. annual aggregate exclusive of legal defense costs. The coverage provided under policy number 560-000-200 issued on January 10, 1983. The effective date of said policy is January 10, 1983.

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(c) Whenever requested by the Office of Hazardous Materials Management, Ohio Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Office of Hazardous Materials Management, a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Office of Hazardous Materials Management in which the facility(ies) is (are) located.

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Frank Kinnett - Vice President  
(Authorized Representative)

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P. O. Box 4985, Atlanta, GA 30302

CERTIFICATE ISSUED TO:

Mr. Valdas Adamkus, Regional Administrator

Environmental Protection Agency - Region 5

230 South Dearborn Street

Chicago, IL 60604



OHD 001288109

J. ROBERT ANDERSON, EXECUTIVE VICE PRESIDENT AND CHIEF FINANCIAL OFFICER

February 25, 1983

Mr. Thomas Golz  
 Environmental Protection Agency  
 Waste Management Branch  
 230 South Dearborn Street  
 Chicago, IL 60604

RECEIVED  
 MAR 03 1983  
 WASTE MANAGEMENT  
 BRANCH

Dear Mr. Golz:

Subject: RCRA Financial Requirements

I am the chief financial officer of The Firestone Tire & Rubber Company, 1200 Firestone Parkway, Akron, Ohio 44317. This letter is in support of the firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

<u>EPA ID No.</u>	<u>Name/Address</u>	<u>Closure Costs</u>	<u>Post-Closure Costs</u>
OHDO01288109	Firestone Tire & Rubber Co. World Headquarters Building 1200 Firestone Parkway Akron, OH 44317	\$ 2,200	\$ -0-
OHT400012118	Firestone Tire & Rubber Co. Research Pilot Plant 381 W. Wilbeth Road Akron, OH 44301	\$ 6,600	\$ -0-
OHDO87234647	Firestone Steel Products Co. 1600 Firestone Parkway Akron, OH 44301	\$55,000	\$ -0-

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

<u>EPA ID No.</u>	<u>Name/Address</u>	<u>Closure Costs</u>	<u>Post-Closure Costs</u>
CAD990793887	Firestone Tire & Rubber Co. 340 El Camino Real South Salinas, CA 93901	\$ -0-	\$ 3,300
GAD990855074	Firestone Tire & Rubber Co. Highway #82 Albany, GA 31702	\$ 11,000	\$ -0-
KYD068325273	Firestone Steel Products Co. 2315 Adams Lane Henderson, KY 42420	\$ 22,000	\$ -0-
NC ✓ ILD005199013	Firestone Tire & Rubber Co. 2500 N. 22nd Street Decatur, IL 62525	\$ 16,500	\$ -0-
P NC ✓ ILD006273346	Electric Wheel Company 1120 N. 38th Street Quincy, IL 62301	\$ 9,900	\$ -0-
P NC ✓ IND006418263	Firestone Industrial Products Company Firestone Blvd. at 17th St. Noblesville, IN 46060	\$114,180	\$ 33,000
IAD073494296	Firestone Tire & Rubber Co. Second Ave. & Hoffman Road Des Moines, IA 50305	\$ 550	\$ -0-



<u>EPA ID No.</u>	<u>Name/Address</u>	<u>Closure Costs</u>	<u>Post- Closure Costs</u>
NCD003150562	Firestone Fibers & Textile Co. 1101 W. Second Avenue Gastonia, NC 28052	\$ 7,700	\$ -0-
NCD067191262	Firestone Tire & Rubber Co. Highway 301 North Wilson, NC 27893	\$ 1,650	\$ -0-
OKD000803205	Firestone Tire & Rubber Co. 2500 S. Council Road Oklahoma City, OK 73124	\$ 6,820	\$316,800
TXD008073538	Firestone Synthetic Rubber & Latex Farm Road No. 1006 Orange, TX 77631	\$370,800	\$ -0-

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

<u>EPA ID No.</u>	<u>Name/Address</u>	<u>Closure Costs</u>	<u>Post- Closure Costs</u>
VAD003112588	Firestone Fibers & Textile Co. Main Street Hopewell, VA 23860	\$ 5,500	\$ -0-
TND007020886	Firestone Tire & Rubber Co. Firestone Boulevard Memphis, TN 38107	\$ 8,980	\$ -0-

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on October 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended October 31, 1982.

ALTERNATIVE I

1.	Sum of Current closure and post-closure cost estimates (total of <u>all</u> cost estimates shown in the four paragraphs above).	\$1 million		
*2.	Total liabilities	\$1,369 million		
*3.	Tangible net worth	\$1,292 million		
*4.	Net worth	\$1,303 million		
*5.	Current assets	\$1,402 million		
*6.	Current liabilities	\$ 812 million		
7.	Net working capital (line 5 minus 6)	\$ 590 million		
*8.	The sum of net income plus depreciation, depletion, and amortization	\$ 142 million		
*9.	Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	\$1,761 million		
			<u>YES</u>	<u>NO</u>
10.	Is line 3 at least \$10 million?		X	
11.	Is line 3 at least 6 times line 1?		X	
12.	Is line 7 at least 6 times line 1?		X	
*13.	Are at least 90% of firm's assets located in the U.S.? If not, complete line 14.			X
14.	Is line 9 at least 6 times line 1?		X	
15.	Is line 2 divided by line 4 less than 2.0?		X	
16.	Is line 8 divided by line 2 greater than 0.1?		X	
17.	Is line 5 divided by line 6 greater than 1.5?		X	



I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.



J. Robert Anderson  
Executive Vice President and Chief Financial Officer

February 25, 1983

JRA:cmk

CC: Mr. J. R. Laman/G. B. Markert - Environmental Engr.  
W. Emmett - Passenger Compounding  
J. Lepkowski - Labor Relations - WTG  
J. Markwalder - Diversified Products  
B. J. Kish - Steel Products

February 25, 1983

Mr. J. Robert Anderson  
Executive Vice President and  
Chief Financial Officer  
The Firestone Tire & Rubber Company  
1200 Firestone Parkway  
Akron, OH 44317

Dear Mr. Anderson:

At your request, we have performed the procedures enumerated below with respect to certain data as of October 31, 1982, for The Firestone Tire & Rubber Company, set forth in your letter dated February 25, 1983 to the United States and certain State Environmental Protection Agencies, supporting the use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265. Our review of this data was solely for the purpose of The Firestone Tire & Rubber Company complying with the requirements of the Environmental Protection Agencies and is not to be referred to or distributed for any other purpose. The procedures we performed are summarized as follows:

- a) We compared the amounts for net worth, current assets and current liabilities as per your letter to the amounts in the audited financial statements of The Firestone Tire & Rubber Company and consolidated subsidiaries for the year ended October 31, 1982.
- b) We compared amounts used in calculations made to arrive at the amounts stated in your letter for total liabilities, tangible net worth as per The Firestone Tire & Rubber Company's bank credit restrictions; the sum of net income plus depreciation, depletion and amortization; total assets in the U.S.; and the Company's "No" response to item 13; and agreed these calculations to the information used to prepare the audited financial statements of The Firestone Tire & Rubber Company and consolidated subsidiaries for the year ended October 31, 1982.

Because the above procedures do not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the items referred to above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specified data should be adjusted.

This report relates only to the data specified above and does not extend to any financial statements of The Firestone Tire & Rubber Company taken as a whole.

Very truly yours,

*Coopers & Lybrand*

WFM:cm  
JEB

New York  
Atlanta  
Birmingham  
Boston  
Charlotte  
Chicago  
Cincinnati  
Cleveland  
Costa Mesa  
Dallas  
Denver  
Detroit  
Hartford  
Honolulu  
Houston  
Los Angeles  
Louisville  
Miami  
Minneapolis  
Nashville  
New Orleans  
Parsippany  
Philadelphia  
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Riverside  
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FEB 16 1983

EPA REGION 5  
OFFICE OF REGIONAL  
ADMINISTRATION

February 14, 1983

Cable Address "KERODEN CLV"  
Telex 985214

2600 National City Center, Cleveland, Ohio 44114  
(216) 781-3000

Mr. Valdas Adamkus, Regional Administrator  
Environmental Protection Agency  
Region 5  
230 South Dearborn Street  
Chicago, IL 60604

Dear Mr. Adamkus:

FIRESTONE TIRE & RUBBER CO.  
Akron World Headquarters  
1200 Firestone Pkwy., Akron, OH 44317  
Akron Research Pilot Plant  
381 Wilbeth Road, Akron, OH 44301  
2500 N. 22nd St., Decatur, IL 62525  
FIRESTONE STEEL PRODUCTS PLANT  
1600 Firestone Pkwy., Akron, OH 44301  
FIRESTONE INDUSTRIAL PRODUCTS CO.  
Firestone Blvd. at 17th St.,  
Noblesville, IN 44060  
ELECTRIC WHEEL CORPORATION  
1120 N. 38th St., Quincy, IL 62301

The enclosed "Hazardous Waste Facility Certificate of Liability Insurance" evidencing certain liability insurance is filed on behalf of The Firestone Tire & Rubber Company for its locations referenced above.

RECEIVED  
FEB 17 1983  
WASTE MANAGEMENT  
BRANCH

Buenos Aires  
Adelaide  
Brisbane  
Hobart  
Melbourne  
Perth  
Sydney  
Belem-Para  
Belo Horizonte  
Campinas  
Curitiba  
Porto Alegre  
Rio de Janeiro  
Salvador  
Sao Paulo  
Santiago  
Bogota  
Cali  
Medellin  
London  
Paris  
Tehran  
Milan  
Rome  
Padua  
Tokyo  
Auckland  
Christchurch  
Wellington  
Lima  
Hong Kong  
Singapore  
Taipei  
Caracas  
Maracaibo  
Puerto La Cruz

SEE  
EXT  
FILE

JOHNSON & HIGGINS

Mr. Valdas Adamkus  
February 14, 1983  
Page 2

Please contact us as soon as possible if the enclosures do not meet your requirements, or if further information is required.

Yours very truly,



Jack F. Bauer  
Vice President

JFB:db  
Enclosure

cc: Mr. Angelo Natoli, Risk Management Department  
The Firestone Tire & Rubber Co., Akron, OH



HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. The International Insurance Company of Chicago, Illinois hereby certifies that it has issued liability insurance covering bodily injury and property damage to THE FIRESTONE TIRE & RUBBER CO. of 1200 FIRESTONE PARKWAY, AKRON, OH 44317 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at 1) Firestone Tire & Rubber Co., 1200 Firestone Parkway, Akron, OH 44317 - EPA I.D. #OHD 001288109; 2) Akron Research Pilot Plant, 381 Wilbeth Road, Akron, OH 44301 - EPA I.D.# OHT 400012118; 3) Firestone Steel Products, 1600 Firestone Parkway, Akron, OH 44301; EPA I.D.# OHD 087234647

for non-sudden accidental occurrences.

The limits of liability are \$ 3,000,000. each occurrence and \$ 6,000,000. annual aggregate exclusive of legal defense costs. The coverage provided under policy number 560-000-200 issued on January 10, 1983. The effective date of said policy is January 10, 1984.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Frank Kinnett

Frank Kinnett - Vice President  
(Authorized Representative)

International Insurance Company  
% The London Agency, Inc.

P. O. Box 4985, Atlanta, GA 30302

CERTIFICATE ISSUED TO:

Mr. Valdas Adamkus

Regional Administrator

Environmental Protection Agency - Region 5

230 South Dearborn Street

Chicago, IL 60604



HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. The International Insurance Company of Chicago, Illinois hereby certifies that it has issued liability insurance covering bodily injury and property damage to THE FIRESTONE TIRE & RUBBER CO. of 1200 FIRESTONE PARKWAY, AKRON, OH 44317 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at \_\_\_\_\_

1) Firestone Tire & Rubber Company, 2500 N. 22nd Street, Decatur, IL 62525  
EPA Identification No. ILD 005199013; 2) Electric Wheel Corporation, 1120 N.  
38th Street, Quincy, IL 62301; EPA Identification No. ILD 006273346

for non-sudden accidental occurrences.

The limits of liability are \$ 3,000,000. each occurrence and \$ 6,000,000. annual aggregate exclusive of legal defense costs. The coverage provided under policy number 560-000-200 issued on January 10, 1983. The effective date of said policy is January 10, 1984.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

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Frank Kinnett

Frank Kinnett - Vice President  
(Authorized Representative)

International Insurance Company  
% The London Agency, Inc.

P. O. Box 4985, Atlanta, GA 30302

CERTIFICATE ISSUED TO:

Mr. Valdas Adamkus

Regional Administrator

Environmental Protection Agency

Region 5

230 South Dearborn Street

Chicago, IL 60604



HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. The International Insurance Company of Chicago, Illinois hereby certifies that it has issued liability insurance covering bodily injury and property damage to THE FIRESTONE TIRE & RUBBER CO. of 1200 FIRESTONE PARKWAY, AKRON, OH 44317 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at Firestone Industrial Products Company, Firestone Blvd. at 17th Street, Noblesville, IN 46060 EPA Identification No. IND 006418263

for non-sudden accidental occurrences.

The limits of liability are \$ 3,000,000. each occurrence and \$ 6,000,000. annual aggregate exclusive of legal defense costs. The coverage provided under policy number 560-000-200 issued on January 10, 1983. The effective date of said policy is January 10, 1984.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Frank Kinnett  
Frank Kinnett - Vice President  
(Authorized Representative)

International Insurance Company  
% The London Agency, Inc.

P. O. Box 4985, Atlanta, GA 30302

CERTIFICATE ISSUED TO:

Mr. Valdas Adamkus, Regional Administrator  
Environmental Protection Agency - Region 5  
230 South Dearborn Street  
Chicago, IL 60604

# Firestone



Extension  
OHD 001 288 109

February 8, 1983

Mr. Thomas Golz  
Environmental Protection Agency  
Waste Management Branch  
230 South Dearborn Street  
Chicago, IL 60604

Dear Mr. Golz:

SUBJECT: RCRA Financial Requirements  
Ohio EPA ID No. OHD001288109  
Firestone Tire & Rubber Co.  
World Headquarters Bldg.  
1200 Firestone Parkway  
Akron, OH 44317

RCRA Financial Requirements  
Ohio EPA ID No. OHT400012118  
Firestone Tire & Rubber Co.  
Research Pilot Plant  
381 Wilbeth Road  
Akron, OH 44301

RCRA Financial Requirements  
Ohio EPA ID No. OHD087234647  
Firestone Steel Products Co.  
1600 Firestone Parkway  
Akron, OH 44301

Previously The Firestone Tire & Rubber Company elected to use the "financial test" as specified in the revised requirements of Subpart H of 40 Code of Federal Regulations (CFR) Parts 264 and 265 (47 Fed. Reg. 15032 et seq., April 7, 1982 and 47 Fed. Reg. 16544 et seq., April 16, 1982) to meet closure and post-closure care assurance. After the initial submission of the various documents required for the "financial test" we are required to send updated information to the director within ninety (90) days after the closure of each succeeding fiscal year.

Firestone's fiscal year ended October 31, 1982, therefore, the updated information was due January 31, 1983. However, due to the fact that our 10-K report was just published, we do not anticipate having the various documents required for the "financial test" completed until February 28, 1983.

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FEB 11 1983

WASTE MANAGEMENT  
BRANCH

Regarding liability insurance coverage for non-sudden and accidental occurrences as specified in Subpart H of 40 CFR Parts 264 and 265, The Firestone Tire & Rubber Company has placed a firm order for the required coverage and is proceeding to obtain certificate documents. Due to a large backlog, our insurance carrier and brokers are experiencing difficulty preparing the required certificates. Hopefully, they will be released shortly.

Please direct any correspondence or questions concerning this matter to the undersigned. My phone number is 216/379-7490.

Sincerely,

A handwritten signature in dark ink, reading "A. V. Natoli". The signature is written in a cursive, slightly slanted style.

A. V. Natoli, Manager  
Property Insurance  
Risk Management Department

AVN:5:0486m

cc: J. R. Laman/G. R. Markert - Environmental Engr.  
W. Emmett - Passenger Compounding  
J. Lepkowski - Labor Relations - WTG  
J. Markwalder - Diversified Products  
B. J. Kish - Steel Products



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Boston  
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Detroit  
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Parsippany  
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Pittsburgh  
Portland  
Richmond  
Riverside  
St. Louis  
San Diego  
San Francisco  
Seattle  
Stamford  
Tulsa  
Washington D.C.  
Wilmington  
Calgary  
Edmonton  
Montreal  
Quebec  
Toronto  
Vancouver  
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WASTE MANAGEMENT BRANCH  
EPA REGION V

JUL 20 1982

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Hong Kong  
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Taipei  
Caracas  
Maracaibo  
Puerto La Cruz

Cable Address "KERODEN CLV"  
Telex 985214

July 12, 1982

2600 National City Center, Cleveland, Ohio 44114  
(216) 781-3000

Mr. Valdas Adamkus, Regional Administrator  
Environmental Protection Agency  
Region 5  
230 South Dearborn Street  
Chicago, IL 60604

RE: Firestone Tire & Rubber Co.  
1200 Firestone Parkway - Akron, OH 44317

381 Wilbeth Rd. - Akron, OH 44301

Firestone Steel Products  
1600 Firestone Parkway - Akron, OH 44301

Firestone Synthetic Rubber & Latex  
381 Wilbeth Rd. - Akron, OH 44301

Ravenna Arsenal, Inc.  
Slagle Rd. - Ravenna, OH 44266

Dear Mr. Adamkus:

The enclosed "Hazardous Waste Facility Certificate of Liability Insurance" evidencing certain liability insurance is filed on behalf of The Firestone Tire & Rubber Company for its locations referenced above.

Please contact us as soon as possible if the enclosures do not meet your requirements, or if further information is required.

Yours very truly,

Jack F. Bauer  
Vice President

JFB:db  
Enclosure

cc: Mr. Angelo Natoli, Risk Management Department  
The Firestone Tire & Rubber Co., Akron, OH

HAZARDOUS WASTE FACILITY  
CERTIFICATE OF LIABILITY INSURANCE

1.   Name of Insurer:               Insurance Company of North America  
     Address of Insurer:       127 John Street  
                                  New York, New York 10038

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

- Name of Insured:           Firestone Tire & Rubber Company  
     Address of Insured:       1200 Firestone Parkway  
                                 Akron, Ohio 44317

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (Various Locations - See Below) for "sudden accidental occurrences." The limits of liability are \$1,000,000 each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number SCG 209323 issued on July 10, 1982. The effective date of said policy is July 10, 1982.

2.   The insurer further certifies the following with respect to the insurance described in Paragraph 1:

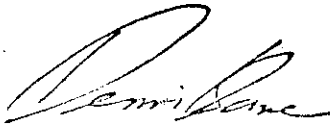
- (a)   Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b)   The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
- (c)   Whenever requested by a Regional Administrator of the U. S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- (d)   Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

SCHEDULE

<u>Name of Facility</u>	<u>Address or Location</u>	<u>EPA Identification Number</u>
Firestone Tire & Rubber Co.	1200 Firestone Parkway Akron, OH 44317	OHDO01288109
Firestone Tire & Rubber Co.	381 Wilbeth Road Akron, OH 44301	OHDO000817239 OHDO01288109
Firestone Steel Products Co.	1600 Firestone Parkway Akron, Ohio 44301	OHDO87234647
Firestone Synthetic Rubber & Latex Co.	381 Wilbeth Road Akron, Ohio 44301	OHDO77786309
Ravenna Arsenal, Inc.	Slagle Road Ravenna, OH 44266	OH5210020736

  
\_\_\_\_\_  
Authorized Representative & Title

(Type Name) Dennis Kane, Vice President

Name of Insurer Insurance Company of North America

Address of Insurer 127 John Street  
New York, NY 10038



# Firestone



EXECUTIVE VICE PRESIDENT

July 2, 1982

Mr. Thomas Golz  
Environmental Protection Agency  
Waste Management Branch  
230 South Dearborn Street  
Chicago, IL 60604

Dear Mr. Golz:

Re: RCRA Financial Requirements

I am the chief financial officer of The Firestone Tire & Rubber Company, 1200 Firestone Parkway, Akron, Ohio 44317. This letter is in support of the firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

<u>EPA ID No.</u>	<u>Name/Address</u>	<u>Closure Costs</u>	<u>Post- Closure Costs</u>
OHDO01288109	Firestone Tire & Rubber Co. World Headquarters Bldg. 1200 Firestone Parkway Akron, Ohio 44317	\$ 2,000	\$ -0-
OHDO01288109	Firestone Tire & Rubber Co. Research Pilot Plant 381 Wilbeth Road Akron, Ohio 44301	\$ 6,000	\$ -0-
OHDO87234647	Firestone Steel Products Co. 1600 Firestone Parkway Akron, Ohio 44301	\$50,000	\$ -0-
OHDO77786309	Firestone Synthetic Rubber & Latex	\$ 4,000	\$ -0-
OHDO000817239	381 Wilbeth Road Akron, Ohio 44301		

<u>EPA ID No.</u>	<u>Name/Address</u>	<u>Closure Costs</u>	<u>Post-Closure Costs</u>
OH5210020736	Ravenna Arsenal, Inc. Load Line 6 Slagle Road Ravenna, Ohio 44266	\$ 2,500	\$ -0-
IND006418263	Firestone Industrial Products Company Firestone Blvd. at 17th St. Noblesville, IN 46060	\$103,800	\$ 30,000
MID095396065	Firestone Steel Products Co. 17423 W. Jefferson Avenue Wyandotte, MI 48192	\$1,000,000	\$ -0-

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

<u>EPA ID No.</u>	<u>Name/Address</u>	<u>Closure Costs</u>	<u>Post-Closure Costs</u>
ARD008049298	Firestone Coated Fabrics Co. Highway 82 West Magnolia, AR 71753	\$12,500	\$ -0-
ARD050928696	Prescott Industrial Products Company State Highway 24 West Prescott, AR 71847	\$ 10,000	\$ -0-
ARD001657857	Firestone Tire & Rubber Co. Highway 64 South Russellville, AR 72801	\$ 1,300	\$ -0-

<u>EPA ID No.</u>	<u>Name/Address</u>	<u>Closure Costs</u>	<u>Post-Closure Costs</u>
GAD990855074	Firestone Tire & Rubber Co. Highway #82 Albany, GA 31702	\$10,000	\$ -0-
ILDO43364496	Firestone Tire & Rubber Co. Ft. Jesse & Rte. 66 N. Bloomington, IL 61701	\$ 2,225	\$ -0-
ILDO05199013	Firestone Tire & Rubber Co. 2500 N. 22nd Street Decatur, IL 62525	\$15,000	\$ -0-
ILDO06273346	Electric Wheel Company 1120 N. 38th Street Quincy, IL 62301	\$ 9,000	\$ -0-
IADO45614120	Firestone Tire & Rubber Co. Second Ave. & Hoffman Road Des Moines, IA 50305	\$ 500	\$ -0-
OKDO00803205	Firestone Tire & Rubber Co. 2500 S. Council Road Oklahoma City, OK 73124	\$ 6,200	\$288,000
TXDO08073538	Firestone Synthetic Rubber & Latex Farm Road No. 1006 Orange, TX 77631	\$337,094	\$ -0-

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

<u>EPA ID No.</u>	<u>Name/Address</u>	<u>Closure Costs</u>	<u>Post-Closure Costs</u>
CAD990793887	Firestone Tire & Rubber Co. 340 El Camino Real S. Salinas, CA 93901	\$ -0-	\$ 3,000

<u>EPA ID No.</u>	<u>Name/Address</u>	<u>Closure Costs</u>	<u>Post-Closure Costs</u>
KYD068323781	Firestone Fibers & Textile Co. Highway 31 Bowling Green, KY 42101	\$ 7,000	\$ -0-
KYD068325273	Firestone Steel Products Co. 2315 Adams Lane Henderson, KY 42420	\$20,000	\$ -0-
NCD003150562	Firestone Fibers & Textile Co. 1101 W. Second Avenue Gastonia, NC 28052	\$ 7,000	\$ -0-
NCD067191262	Firestone Tire & Rubber Co. Highway 301 North Wilson, NC 27893	\$ 1,500	\$ -0-
SCD003343316	Firestone Steel Products Co. County Home Road Spartanburg, SC 29301	\$25,000	\$ -0-
VAD003112588	Firestone Fibers & Textile Co. Main Street Hopewell, VA 23860	\$ 5,000	\$ -0-
TND007020886	Firestone Tire & Rubber Co. Firestone Blvd. Memphis, TN 38107	\$ 8,160	\$ -0-
TND065833196	Firestone Tire & Rubber Co. Interstate 24, Exit 62 Nashville (Laverne), TN 37086	\$ 5,027	\$ -0-

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on October 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended October 31, 1981.

#### ALTERNATIVE I

1. Sum of Current closure and post-closure cost estimates \$2 million  
(total of all cost estimates shown in the four paragraphs above)

*2. Total liabilities	\$1,575 million	
*3. Tangible net worth	\$1,431 million	
*4. Net worth	\$1,443 million	
*5. Current assets	\$1,641 million	
*6. Current liabilities	\$ 958 million	
7. Net working capital (line 5 minus 6)	\$ 683 million	
*8. The sum of net income plus depreciation, depletion, and amortization	\$ 296 million	
*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	\$1,902 million	
	<u>YES</u>	<u>NO</u>
10. Is line 3 at least \$10 million?	X	
11. Is line 3 at least 6 times line 1?	X	
12. Is line 7 at least 6 times line 1?	X	
*13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14.		X
14. Is line 9 at least 6 times line 1?	X	
15. Is line 2 divided by line 4 less than 2.0?	X	
16. Is line 8 divided by line 2 greater than 0.1?	X	
17. Is line 5 divided by line 6 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

*Victor H Brown*

Victor H. Brown  
Executive Vice President - Finance

July 2, 1982

VHB:cmh  
Attachment

See attached "Supplemental Notice - Liability Insurance"



SUPPLEMENTAL NOTICE  
LIABILITY INSURANCE

Regarding liability insurance coverage for sudden and accidental occurrences as specified in Subpart H of 40 CFR Parts 264 and 265, The Firestone Tire & Rubber Company has the required coverage and is proceeding to obtain certificate documentation. Our insurance carrier, The Insurance Company of North America, through the offices of Johnson & Higgins will be providing these certificates directly to the EPA on behalf of Firestone.

*Victor H Brown*

Victor H. Brown  
Executive Vice President - Finance

July 2, 1982

July 2, 1982

Mr. Victor H. Brown  
Executive Vice President - Finance  
The Firestone Tire & Rubber Company  
1200 Firestone Parkway  
Akron, OH 44317

Dear Mr. Brown:

At your request, we have performed the procedures enumerated below with respect to certain data as of October 31, 1981, for The Firestone Tire & Rubber Company, set forth in your letter dated July 2, 1982 to the Environmental Protection Agency, supporting the use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265. Our review of this data was solely for the purpose of The Firestone Tire & Rubber Company complying with the requirements of the Environmental Protection Agency and is not to be referred to or distributed for any other purpose. The procedures we performed are summarized as follows:

- a) We compared the amounts for net worth, current assets and current liabilities as per your letter to the amounts in the audited financial statements of The Firestone Tire & Rubber Company and consolidated subsidiaries for the year ended October 31, 1981.
- b) We compared amounts used in calculations made to arrive at the amounts stated in your letter for total liabilities, tangible net worth as per The Firestone Tire & Rubber Company's bank credit restrictions; the sum of net income plus depreciation, depletion and amortization; total assets in the U.S.; and the Company's "No" response to item 13; and agreed these calculations to the information used to prepare the audited financial statements of The Firestone Tire & Rubber Company and consolidated subsidiaries for the year ended October 31, 1981.

Because the above procedures do not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the items referred to above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specified data should be adjusted.

This report relates only to the data specified above and does not extend to any financial statements of The Firestone Tire & Rubber Company taken as a whole.

Very truly yours,

*Coopers & Lybrand*

**B. Permit Application  
/Post Permit**

**Ohio EPA**

Re: Emergency Hazardous Waste Permit  
Ohio Permit No. 02-77-003E

May 13, 1985

RECEIVED

MAY 17 1985

Ohio Environmental Protection Agency  
ENTERED DIRECTOR'S JOURNAL

MAY 1 3 1985

Firestone Tire and Rubber Company  
Attn: R. E. Jereb  
1200 Firestone Parkway  
Akron, Ohio 44317

CERTIFIED MAIL

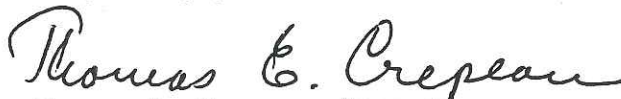
Dear Sir:

Enclosed please find an Emergency Hazardous Waste Permit being issued to you pursuant to Rule 3745-50-57 of the Ohio Administrative Code (OAC). This permit constitutes the written emergency permit required by Rule 3745-50-57 (B)(1) to be issued after the granting of an oral emergency permit.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review  
250 E. Town St.  
Room 101  
Columbus, Ohio 43215

Very truly yours,



Thomas E. Crepeau, Manager  
Data Management Section  
Division of Solid and Hazardous Waste Management

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Virgil Davis Date 5/13/85

cc: **Dan Banasczek, US EPA, Region V**  
Ed Lim, HWFB  
Steven White, Ohio EPA, DSHWM  
Tim Lawrence, Ohio EPA, DSHWM, Engineering Sect.  
Bill Skowronski, NEDO

1289R

OHIO ENVIRONMENTAL PROTECTION AGENCY

EMERGENCY HAZARDOUS WASTE PERMIT

Name of Applicant: Firestone Tire and Rubber Company  
Mailing Address: 1200 Firestone Parkway Akron, Ohio 44317  
Facility Location: 1200 Firestone Parkway Akron, Ohio 44317  
Ohio Permit Number: 02-77-003E  
US EPA I.D. Number: OHD001288109  
Effective Date: April 24, 1985  
Expiration Date: April 25, 1985

AUTHORIZED ACTIVITIES

Pursuant to Ohio Revised Code Section 3734.02(J) and rules promulgated thereunder (Ohio Administrative Code Rule 3745-50-57), an emergency permit is issued to the applicant indicated above (hereinafter "Permittee") to operate a hazardous waste treatment facility at the location indicated in the terms and conditions of this permit. The conditions of this permit were developed in accordance with applicable provisions of Ohio Administrative Code Chapter 3745-50 and the Hazardous Waste Facility Standards Chapters 3745-50 et seq.

PERMIT APPROVAL

The Permittee shall comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable rules specified in the permit. Applicable rules are those which are in effect on the date of the issuance of this permit. This permit may be revoked at any time without process if the Director determines that revocation is appropriate to protect public health, safety or the environment. The terms and conditions of this permit may be revised during its duration if the Director determines that such revision is necessary to protect public health, safety or the environment.

by

  
Warren W. Tyler

Date: May 13, 1985

Ohio Environmental Protection Agency  
ENTERED DIRECTOR'S JOURNAL

1262U

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: David Davis Date: 5/13/85

MAY 13 1985



- I. Standard Conditions. The Permittee shall comply with Rule 3745-50-58, of the Ohio Administrative Code (OAC) "Conditions applicable to all permits", which conditions are incorporated herein by reference.
- II. General Facility Conditions. The Permittee shall comply with the following rules of the Ohio Administrative Code which are incorporated herein by reference:

3745-54-14(A),(B)	- Security
3745-54-15(A)	- General Inspection Requirements
3745-54-17(A),(B)	- General Requirements for Ignitable, Reactive or Incompatible Waste*
3745-54-31	- Design and Operation of Facility
3745-54-32	- Required Equipment
3745-54-33	- Testing and Maintenance of Equipment
3745-54-34	- Access to Communications or Alarm System
3745-54-37	- Arrangements With Local Authorities
3745-54-55	- Emergency Coordinator
3745-54-56	- Emergency Procedures
3745-54-73(A),(B)(1),(B)(2)	- Operating Record
3745-54-74	- Availability, Retention and Disposal of Records
3745-55-11	- Closure Performance Standards
3745-55-14	- Disposal or Decontamination of Equipment
3745-55-47	- Liability Requirements
3745-55-48	- Incapacity of Owners or Operators, Generators, or Financial Institutions

\*Except that specific written or verbal instructions to all affected personnel may be substituted in lieu of "No Smoking" signs.

III. Special Conditions.

- A. Waste Identification. The Permittee may destroy picric acid containers.
- B. Method of Treatment. Authorized treatment under this permit shall consist of detonation of the hazardous wastes cited above. All hazardous wastes cited above shall be treated in accordance with this permit. The detonation(s) shall be accomplished on one occasion and take place on or before April 25, 1985.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Virgil Davis Date 5/13/85

Ohio Environmental Protection Agency  
ENTERED DIRECTOR'S JOURNAL

MAY 1 3 1985

- C. Location. Treatment shall occur on the Firestone Tire and Rubber premises, at 1200 Firestone Parkway, Akron, Ohio. Selection of the treatment area shall be made on the basis of topography, wind direction, proximity to utility lines and/or other man-made constructions and any other factors, so as to minimize any deleterious effect on the public and the environment. The Permittee shall take all appropriate measures to minimize noise occasioned by the detonation.

Isolation distances shall be at least those required by OAC Rule 3745-68-82.

Pounds of waste, explosives or  
propellants

Minimum distance from open burning or  
detonation to the property of others

0 - 100	204 meters ( 670 feet)
101 - 1,000	300 meters (1,250 feet)
1,101 - 10,000	530 meters (1,730 feet)
10,000 - 30,000	690 meters (2,260 feet)

- D. Preparedness and Prevention. Detonations shall occur in an area capable of withstanding a blast. Adequate security shall be provided by the Permittee, to prevent the entry of persons into dangerous areas surrounding the detonation zone. Adequate firefighting and first aid equipment shall be provided by the Permittee and/or by the local fire department.

Handling and transportation of the waste to the treatment area shall be accomplished by persons with experience and/or training in the handling of reactive and ignitable materials. All wastes shall be properly packed and stabilized prior to transportation.

The detonation shall take place under the direct supervision of Mr. R. E. Jereb of Firestone Tire and Rubber Company or his authorized designee.

- E. Inspection/Disposal of Residues. The Permittee shall inspect the treatment area after each detonation for undetonated waste. The Permittee shall determine whether detonation residues are hazardous wastes pursuant to the OAC Rules 3745-50-01 et seq. with such determination subject to confirmation by Ohio EPA personnel. All residues determined to be hazardous waste shall be managed as such pursuant to the OAC Chapters 3745-50 et seq.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Wanda Davis Date 5/13/85

Ohio Environmental Protection Agency  
ENTERED DIRECTOR'S JOURNAL

MAY 1 3 1985

- F. Other Approvals. The Permittee shall obtain, prior to treatment under this permit, all necessary federal and local approvals, permits, and/or licenses.
- G. Required Notices. The Northeast District Office of the Ohio EPA shall be notified by the Permittee at least 12 hours prior to the scheduled detonation.

Local fire department officials shall be notified at least 12 hours prior to the scheduled detonation.

Local fire department officials and the Ohio EPA district office personnel shall be provided the opportunity to be present during the detonation.

Ohio Environmental Protection Agency  
ENTERED DIRECTOR'S JOURNAL

MAY 13 1985

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Vivian Davis Date 5/13/85

## **C.2 Compliance And Enforcement**

PC - updated  
25 FEB 1988

5HS-12

Mr. David McMillen  
Firestone World Headquarters  
1200 Firestone Parkway  
Akron, Ohio 44317

Re: Firestone World Headquarters  
Akron, Ohio  
OHD 001 288 109

Dear Mr. McMillen:

On September 30, 1987, an authorized representative of the United States Environmental Protection Agency inspected the above facility. The purpose of the inspection was to determine the facility's compliance with the land disposal restrictions of certain spent solvents which became effective on November 8, 1986; reference 40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270. A copy of the inspection report is enclosed for your information.

At the time of the inspection the facility was operating as a small quantity generator (SQG), generating more than 100 kilogram (kg) but less than 1000 kg of hazardous wastes in a calendar month. As a SQG, your facility is subject to both the federal hazardous waste requirements found under 40 CFR Part 262, and Ohio's Hazardous Waste Rules 3745-51-05.

SQGs have been granted a two-year national variance to the above land disposal restrictions under 40 CFR Part 268.1 and .30. However, any restricted waste disposal at a land disposal facility must be accompanied by a notification stating that the waste is exempt from the land disposal restrictions, as required under 40 CFR Part 268.7(a)(3). All SQGs will become subject to the land disposal restrictions on November 8, 1988, when the variance expires.



- 2 -

Additionally, if your facility begins generating more than 1000 kg or more of hazardous waste, or more than 1 kg of acutely hazardous waste in any month, it would be categorized as a generator and become subject to all applicable federal and state hazardous waste laws, including the 40 CFR Part 268 land disposal restrictions.

Thank you for your cooperation. If you have any questions concerning this letter, please contact Mr. Paul Little of my staff at (312) 886-8096.

Sincerely yours,

**ORIGINAL SIGNED BY**  
**WILLIAM E. MUNO**

William Muno, Chief  
RCRA Enforcement Branch

cc: Mike Savage, OEPA  
Debbie Berg, OEPA

5HS-12:PLITTLE:fer:6-8096:2-10-88:Disk#2

	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SEC'Y	SECT. CHIEF	MWED CHIEF	RECD DATE
INT. DATE	fer 2-22-88	R 2-22-88		SES 2-23-88	ap 2/24/88	WEM 2/24/88		

# 2594

**CLOSURE PLAN  
HAZARDOUS WASTE DRUM STORAGE FACILITY  
RESEARCH PILOT PLANT  
THE FIRESTONE TIRE & RUBBER CO.  
AKRON, OHIO**

**Prepared for:  
The Firestone Tire & Rubber Co.  
1200 Firestone Parkway  
Akron, Ohio 44317**

**Prepared by:  
Woodward-Clyde Consultants  
32111 Aurora Road  
Solon, Ohio 44139**

**22 February 1989**

dLSD

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## FIGURES

**CLOSURE PLAN  
HAZARDOUS WASTE DRUM STORAGE FACILITY  
RESEARCH PILOT PLANT  
THE FIRESTONE TIRE & RUBBER CO.  
AKRON, OHIO**

**1.0 FACILITY DESCRIPTION**

The Firestone Research Pilot Plant is a pilot facility for the process development area of the Firestone Central Research Laboratories. Synthetic polymers are produced on an experimental basis. The facility is located at 381 W. Wilbeth Road in Akron, Ohio (Figure 1). Hazardous wastes resulting from the Pilot Plant consist of waste solvents (primarily hexane, but also some methylene chloride, acetone, methanol and toluene as minor constituents), waste polymer cements (butadiene/styrene in hexane) and potentially reactive solids (phosphonitrilic chloride trimer and derivatives). The materials have been stored in drums on a curbed, concrete pad in accordance with Ohio Permit No. 02-77-0439 and U.S. EPA I.D. No. OHD980681886. There have been no known spills or releases of wastes.

The drum storage pad is located south of the Pilot Plant and consists of an open-air concrete pad that is abutted by buildings on the north and east sides, and is curbed on the south and west sides (Figure 2). Part of the "curbing" on the south side consists of a hump in the asphalt-paved access drive that allows trucks to enter the area while retaining surface water within the pad area. The storage pad slopes to the southeast. The southeast "corner" of the pad effectively constitutes a sump that can be emptied by means of a drain valve that is installed through the curbing. The drain discharges onto a grass-covered drainage swale.

The storage pad dimensions are approximately 42 feet by 36 feet. The estimated maximum inventory of hazardous waste is 240 drums (approximately 12,000 gallons).

## 2.0 CLOSURE SCHEDULE

Expected year of closure: 1989

Date of closure initiation: 31 July 1989

Date of initial drum removal: 31 July 1989

Date of completion of drum removal: 28 October 1989

Date of start of pad cleaning: 30 October 1989

Date of completion of final closure: 31 January 1990 or 6 months from plan approval

## 3.0 CLOSURE PROCEDURES

Upon receipt of approval of this Closure Plan, no further hazardous waste will be accepted for storage. All stored waste will be transported to an appropriate disposal facility within 90 days of closure initiation. The estimated maximum inventory of hazardous waste is 240 drums.

After the drums are removed, cleaning of the storage pad will commence. The pad will first be scraped manually using shovels to remove any accumulated solids. The solids are known by Firestone to be non-hazardous and will be disposed with general waste. The pad will then be washed with a detergent solution (Liquinox or equal) using a scrubber machine. The wash water will be vacuumed into a drum or drums for sampling and disposal purposes. The pad will then be rinsed with tap water. The rinse water will be vacuumed into another drum or drums and sampled. If analysis of the rinse water indicates contamination (greater than 1 mg/l total organics), the procedure will be repeated until target level is reached (less than 1 mg/l total organics) in the rinse water. When the target level is achieved, the pad will be considered clean. Containerized water with total organic concentrations greater than 1 mg/l will be sent to an appropriate disposal facility. Waters with total organics levels at or below 1 mg/l will be discharged on-site.

Because the storage pad has a sump area with a drain that discharges onto a grass-covered drainage swale, soil samples will be obtained, initially at one location, for analyses to verify the quality of the soil with respect to volatile organic compounds. Any of the trimer would have previously reacted and would not present a concern. The sampling location would be immediately downstream of the drain discharge. Two soil samples will be obtained at this location: one at the surface,



the other at approximately two (2) feet below ground surface. If analytical results indicate the total concentration of a volatile compound in the soil is in excess of the extract concentration limit under the Toxicity Characteristic Leaching Procedure (TCLP) or, for compounds not listed under TCLP, is in excess of 10 mg/kg, additional soil sampling and testing will be performed to assess the extent of soil contamination. Soils that contain unacceptable levels of contaminants will be excavated, transported and disposed by an appropriate, licensed waste removal firm.

All equipment used on-site will be cleaned with a steam cleaner or high pressure, hot water prior to leaving the site. Personnel will clean all non-disposable clothing with a detergent wash and tap-water rinse. All waters generated from these procedures will be collected and transferred to the wash-water drum or drums for analysis and subsequent disposal. Additional details are presented in Section 5.0.

#### 4.0 FINAL CLOSURE

Upon verification that the facility has been closed such that it meets Ohio EPA criteria, closure will be completed. At that time, The Firestone Tire & Rubber Co. will submit to the Regional Administrator and the Ohio EPA certification by Firestone and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan. The closure certification will read as follows:

"I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ATTACHMENTS AND THAT, BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT."

## **5.0 SAMPLING AND ANALYSIS PLAN**

This plan documents the procedures that will be followed by sampling team personnel. Included in the Sampling and Analysis Plan (SAP) are descriptions of sample collection and sample handling techniques. Samples obtained during closure will consist of wash water from the Drum Storage Pad and rinse water from the Drum Storage Pad.

Field sampling will be performed by Firestone or its designated consultant. A Sampling Team Leader (STL) will be responsible for all field sampling activities. The STL will be responsible for the availability and maintenance of sampling equipment and materials, for sample shipping and packing materials, for completion of all chain-of-custody records, and for proper handling and shipping of samples. The STL will also be responsible for obtaining proper sample containers from the laboratory. Records of field activities will be compiled and forwarded to Firestone. Sampling team members, under the STL's direction, will perform field measurements, sample collection and shipping, and equipment cleaning as required.

### **5.1 Drum Storage Pad Cleaning and Rinse Water Sampling**

The concrete pad would be cleaned with a scrubber machine using a detergent wash (Liquinox or equivalent) followed by a high pressure rinse. The floor scrubber is a commonly-used industrial tool that is used to remove dirt and oily residues off concrete pads. It consists of two, very stiff rotary brushes that scrub the concrete surface. While the brushes rotate, detergent is discharged onto the pad and cleans the residues off the pad. As it passes over an area, a vacuum unit (which is attached) sucks the residues and wash water into a container on the back of the machine. The pad will then be rinsed with tap water. The rinse water will be vacuumed into clean, food-quality drums for storage. An analysis of the wash water, rinse water and tap water for full volatile organic priority pollutant compounds will be performed to verify the cleanliness of the pad. If analyses indicate excessive concentrations of contaminants in the rinse water (more than 1 mg/l total organics), the procedure will be repeated until acceptable levels are obtained. The tap water used for preparing the detergent solution and for rinsing will also be analyzed to establish background water quality.

Samples of wash water and rinse water will be collected from the containers using a bottom-entry/discharge PTFE bailer. Tap water will be drawn directly from the source. Samples will be discharged directly into pre-cleaned glass vials with PTFE septa caps (VOA vials). Upon filling, each vial will be capped and then inverted and inspected to assure that no air bubbles are present. The vial will then be placed into an iced shipping container to await transport to the analytical laboratory. Upon completion of sampling, the samples will be delivered to the analytical laboratory either directly or by means of overnight courier. Chain-of-custody protocols will be maintained.

The VOA vials will be supplied and prepared by the analytical laboratory. Each vial will contain 2 to 4 drops of 1:1 HCl prior to introduction of the sample water. Each vial will be labelled, using indelible ink, noting the following:

- o sample I.D. number
- o date and time of sampling
- o names of sampling personnel
- o analyses required
- o preservatives used
- o unusual conditions (e.g. - contains detergent)

The sample I.D. numbers will be unique to each sample source. The I.D. scheme will be as follows:

FRPP-WW-1 A-11.02

FRPP = Firestone Research Pilot Plant; used for every I.D.

WW = wash water

RW = rinse water

TW = tap water

1 A = numeral indicates drum number (first, second, etc.)

letter indicates order of filling of sample containers (A, B, C . . .)

11.02 - digits to left of "." indicate month, to right indicate day of sample collection

All information on sample labels will be replicated in a field book. All drums/containers will be marked with the corresponding sample I.D. number.

Samples of rinse water and tap water will be collected during cleaning operations. Samples of wash water will be collected after all cleaning is completed (including equipment).

## **5.2 Soil Sampling**

The initial soil samples will be obtained manually using shovels and pre-cleaned stainless steel scoops. The surficial sample will be obtained by clearing the sod off the sampling location and then removing a portion of the underlying soil with a scoop. The soil sample will be transferred immediately into a laboratory-prepared sample jar with a PTFE-lined lid. The shovel will then be used to turn out a mass of soil from a depth of approximately 2 feet below grade. Another scoop will be used to remove a portion from the soil mass that is not in contact with the shovel and the sample will be transferred to a sample container. The containers will be placed in an iced, insulated shipping container for delivery to the analytical laboratory, under chain-of-custody protocols. The spoil will be returned to the excavation and the sod will be replaced. The sampling location will be defined by measurements from fixed, physical objects at the site.

Sample jars will be labelled as previously described for the water samples (Section 5.1). The sample I.D. numbering scheme for soil samples will be:

FRPP-SS-1-2/4-11.02

SS = Soil Sample

2/4 - Sample depth interval in feet below surface

All information on sample labels will be in indelible ink and replicated in the field book.

If the analytical results indicate the need for additional sampling to evaluate vertical and lateral extent of contamination, samples will be obtained with a split-barrel sampler in general accordance with ASTM D-1586. The additional sampling locations will be initially established at approximately 10 feet and 30 feet

downslope of the initial sample location, and 5 feet to either side of the initial sample location and the +10-foot sample location (see Figure 2). Soil samples will be obtained continuously, at 2-foot intervals, to a depth of 6 feet below ground surface. A representative portion from each 2-foot interval will be placed in a laboratory-prepared sample container for analyses. Any remaining soil will be returned to the borehole in the same order in which it was removed. Samples will be transferred to the laboratory in iced, insulated shipping containers under chain-of-custody protocols.

Soil samples will continue to be collected in a uniform manner as necessary to define the extent of contamination.

### **5.3 Analytical Methods**

Organic Analyses will be conducted in accordance with methods outlined in SW-846. The appropriate analytical method is dependent upon a sample's phase (aqueous, oil and organic liquid, sludges, solids, multi-phase samples or groundwater) and the detection limits required. The selected methods were based jointly on detection limits and reliability of results.

All solid and aqueous samples will be analyzed by GC/MS Method 8240 (Volatile Organics) for priority pollutant compounds and hexane, styrene and butadiene.

### **5.4 Decontamination Procedures**

#### **5.4.1 Personnel Decontamination**

Non-disposable personal protective gear that has come in direct contact with contaminated water will be decontaminated prior to personnel leaving the site. The complete procedure is as follows:

1. Place equipment and/or samples in designated area



2. Wash any non-disposable protective clothing that has been in contact with contaminated water using:
  - a) detergent (Liquinox or equal) solution
  - b) potable water rinse
3. Remove protective clothing.

#### **5.4.2 Equipment Decontamination**

All sampling equipment will be decontaminated prior to use and between sample location using the following procedure:

1. Detergent (Liquinox or equivalent) solution wash;
2. Potable water rinse;
3. Distilled water rinse.

Sampling personnel will wash their gloves or replace them prior to obtaining each sample. All equipment will be decontaminated prior to its removal from the site.

#### **5.4.3 Sample Container Decontamination**

All sample containers that become contaminated externally due to overflow or splashing will be decontaminated by rinsing the containers with distilled water. Containers will be dried prior to packaging. A check will be made to ensure that all containers are still labelled and that labels are legible.

#### **5.4.4 Generated Wastes**

All disposable protective clothing and disposable sampling equipment will be placed in plastic bags and removed from the site. Bags may be disposed of at the facility in containers for sanitary landfill disposal. All liquids generated by decontamination procedures will be transferred into the wash water container(s) pending analytical results and then disposed in accordance with regulations.

## **6.0 DOCUMENTATION**

### **6.1 Field Log Books**

Field log books will provide means of recording data collection activities performed during each sampling event. Entries will be described in as much detail as possible so that personnel going to the site could reconstruct a particular situation without reliance on memory.

Field log books will be bound, waterproof, field survey books with pages numbered by the manufacturer. Log books will be assigned to all field personnel and will be maintained between sampling events by the Sample Team Leader. The title page of each field log book will contain:

- Person to whom the book is assigned;
- Book number;
- Project name;
- Date issued and date completed.

Entries into the log book will contain a variety of information. At the beginning of each entry, the date, start time, weather, names of all field personnel present and protective clothing used will be entered. The names of visitors to the site and their purpose for being there will be recorded in the field log book.

All measurements and observations made and samples collected will be recorded. Entries will be made in ink and no erasures will be made. If an incorrect entry is made, the information will be crossed out with a single strike mark. Wherever a sample is collected or a measurement is made, a detailed description of the location will be recorded. Equipment used to sample, make measurements, decontaminate, package, etc. will be identified. Each type, number, and volume of sample containers and preservatives will be noted. The time that each sample is collected and a physical description of the sample will also be noted. Specific sample identification numbers will be assigned. Results of all field measurements will be noted in the field log book as well as in appropriate field forms.

## 6.2 Sample Identification Numbers

Refer to Sections 5.1 (water) and 5.2 (soil) for sample I.D. schemes.

## 6.3 Photographs

Photographs of sampling locations and or cleaning procedures may be taken for documentation purposes. The picture and roll number will be logged in the field book to identify which sampling location is depicted in the photograph.

## 6.4 Sample Documentation Forms

A chain-of-custody form will be completed for each shipping container (cooler) prior to transport.

## 7.0 CLOSURE COSTS

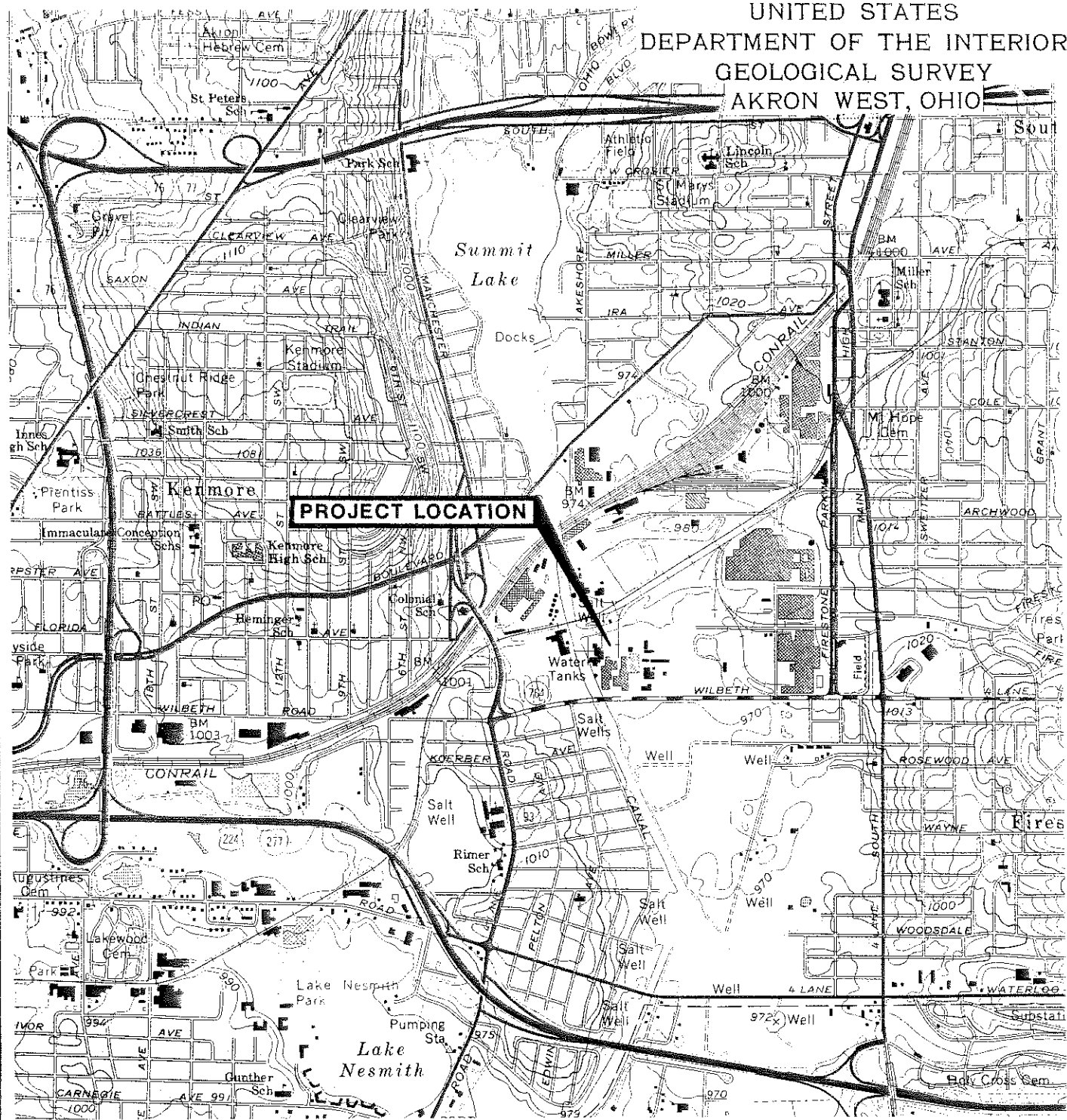
The cost of closure for the Research Pilot Plant at the maximum storage capabilities of the hazardous waste storage area has been estimated as follows:

180 drums flammable liquid (incineration)	\$ 6,300.00
60 drums solid	19,000.00
Transportation costs for above materials	3,000.00
Labor for loading and decontamination	13,800.00
Decontamination chemicals	105.00
Disposal of decontamination washes	1,100.00
Analytical fees	1,000.00
P.E. fees	<u>2,000.00</u>
	\$46,305.00

Post-Closure Cost - Not Applicable

## Figures

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY  
AKRON WEST, OHIO

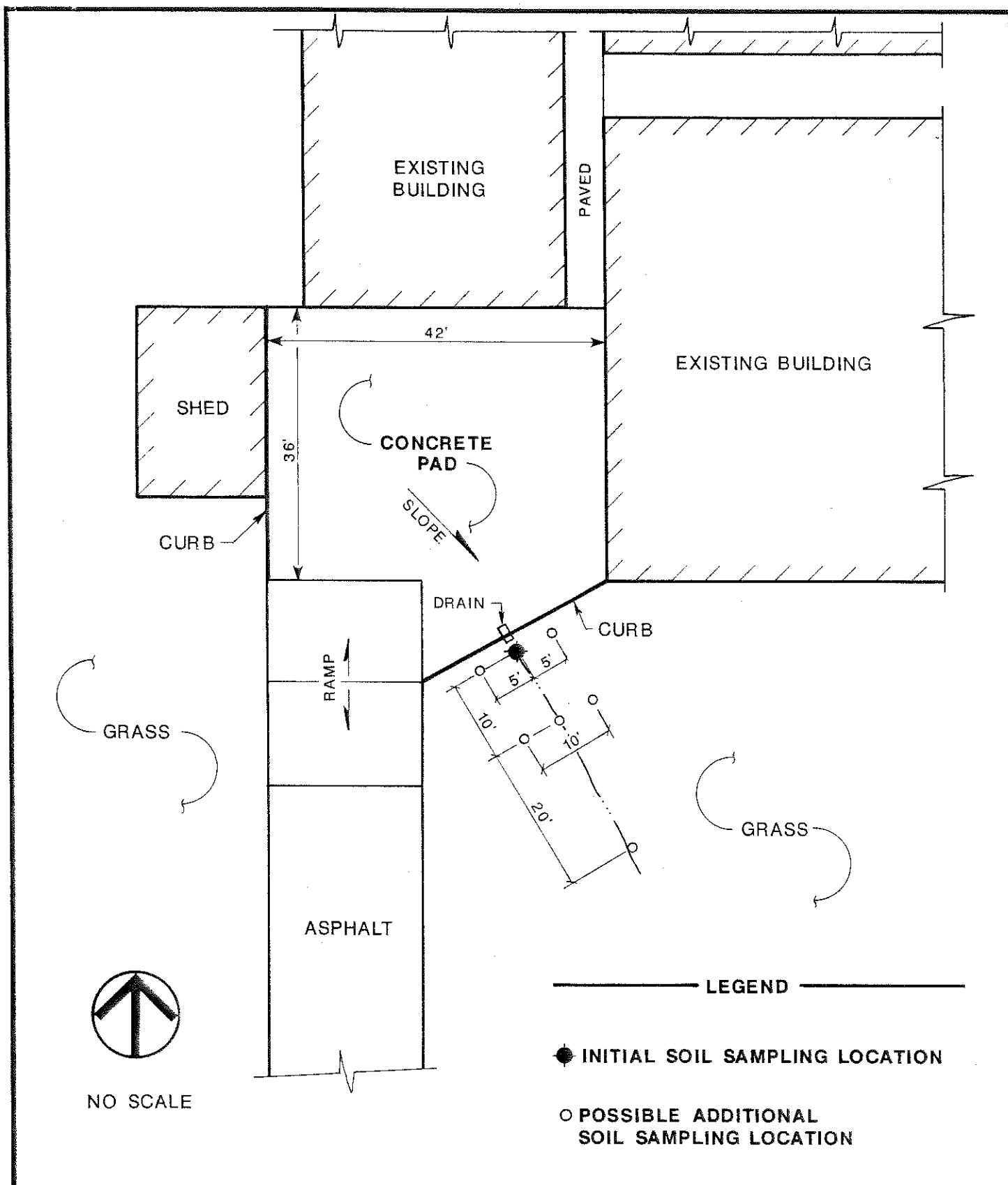


CONTOUR INTERVAL 10 FEET

GENERAL LOCATION MAP  
FIRESTONE RESEARCH PLANT - AKRON, OHIO

DRAWN BY: REM	CHECKED BY: VMB	PROJECT NO: 89C6521	DATE: 2-23-89	FIGURE NO: 1
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## DRUM STORAGE PAD

FIRESTONE RESEARCH PLANT - AKRON, OHIO

DRAWN BY: REM

CHECKED BY: VMB

PROJECT NO: 89C6521

DATE: 2-23-89

FIGURE NO: 2

**CLOSURE OF  
HAZARDOUS WASTE STORAGE FACILITY  
(OHD001288109, #02-77-0325)**

**Prepared For:**  
**The Firestone Tire and Rubber Co.**  
**1200 Firestone Parkway**  
**Akron, Ohio 44317**

**Prepared By:**  
**Woodward-Clyde Consultants**  
**32111 Aurora Rd.**  
**Solon, Ohio 44139**

**THE FIRESTONE TIRE AND RUBBER COMPANY  
CLOSURE OF HAZARDOUS WASTE STORAGE FACILITY**

The hazardous waste storage facility utilized by Firestone Tire and Rubber (OHD 001288109, #02-77-0325) is located adjacent to the Plant 2 facility in Akron, Ohio (Figure 1). The permitted storage facility is of concrete construction, 20 ft. x 10 ft. in size and was constructed as a monolithic (single pour) structure.

Since Firestone Tire and Rubber no longer produces tire or rubber products at the World Headquarters Building, hazardous waste is no longer generated in quantities large enough to warrant keeping a permitted facility. Thus, Firestone Tire and Rubber is submitting this document as evidence of final closure under the plan submitted to the Ohio EPA's Northeast District Office (25 July 1986; revised 11 August 1986). A copy of the revised plan and plan approval by the Ohio EPA and U.S. EPA are shown in Appendix A. A public notice acknowledging the Ohio EPA's receipt of a closure plan for the facility appeared in the Akron Beacon Journal during the week of 17 August 1986. A copy of the notice is shown in Appendix A.

As per Part 1 of the revised closure plan, the remaining wastes at the facility were disposed of. The liquid wastes, 1-55-gallon drum containing waste flammable solvents, was transported by Chem-Freight, Inc. (OHD 075006304) for disposal by Erieway, Inc. (OHD 055522429) of Bedford, Ohio. This task was completed on 27 October 1986. A copy of the shipping manifest is provided in Appendix B.

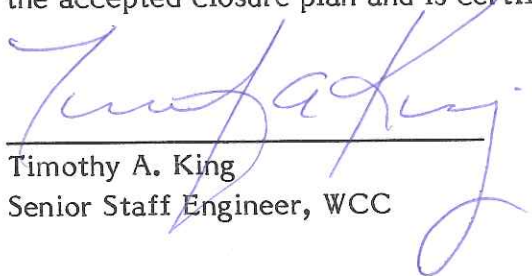
On 27 October 1986, decontamination of the concrete slab was performed in accordance with Part 2 of the revised closure plan. The slab was cleaned using a steam cleaner detergent wash (trade name Dun E-Z) followed by a rinse with clean water.

The rinsate from the first cycle was collected in a 55-gallon drum. A second wash/rinse cycle was also performed. Rinsate was collected as before. The rinsate was stored temporarily on-site pending laboratory results. Samples for volatile organic analysis were collected in glass vials (40 millimeter capacity) and filled until there was no headspace. Other samples were collected in 120 ml. amber glass containers. Observations of the cleaning procedure and water sample collection were conducted by Timothy A. King, a field engineer from Woodward-Clyde Consultants' (WCC) Solon, Ohio office. Samples were stored in a cooler and delivered to Wadsworth/Alert Laboratories in Canton, Ohio. A Chain-of-Custody (COC) form documenting the sample transfer is shown in Appendix C.

Results of the laboratory analyses indicated below detectable limits (less than the 1 mg/l standard) for all parameters except methanol. Methanol was detected at 36,000 ppb (36 mg/l) in the rinsate. Samples of the composite rinsate (first and second rinse cycle) that was stored in the 55-gallon drum were collected and submitted for analysis. Methanol was the only parameter detected (79,000 ppb, 79 mg/l). Since the concentration of methanol was above acceptable limits, a second cleaning event was scheduled for 3 December 1986. The pad was washed twice using steam cleaner. Detergent was not used. Rinsate was collected in the same 55-gallon drum as used on 27 October 1987 and was stored on-site pending the analytical results. Again, field observations and sampling were conducted by Timothy A. King of WCC. Sample analyses were performed by Wadsworth/Alert Laboratories. A COC form for the samples is shown in Appendix C.


The rinsate from the first cleaning event (27 October 1986) was disposed of by Erieway, Inc. of Bedford, Ohio on 5 March 1987. A certificate of disposal is shown in Appendix B. The rinsate from the second cleaning event showed methanol concentration below the 1 mg/l detection limit (as well as all other parameters tested). The rinsate collected from this event was disposed of on 5 March 1987. All lab results are shown in Appendix C. A photo summary of the concrete slab decontamination is shown in Appendix D.

Based on the analytical results from the rinsate samples collected during closure of the Hazardous Waste Storage Area, all parameters of concern (as outlined in the revised closure plan of 11 August 1986) were below the 1.0 mg/l level. Therefore, the hazardous waste storage facility has been closed in accordance with the accepted closure plan and is certified as such by the undersigned.



---

Timothy A. King  
Senior Staff Engineer, WCC



---

James A. Morrison, P.E.  
Assistant Project Engineer, WCC



---

A.H. King, P.E.  
The Firestone Tire & Rubber Co.

**Figures**



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY  
AKRON WEST, OHIO



**GENERAL LOCATION MAP**

**FIRESTONE TIRE & RUBBER CO. - HAZARDOUS WASTE STORAGE FACILITY**

DRAWN BY: REM

CHECKED BY: TAKI

PROJECT NO: 86C3551

DATE: 2-12-87

FIGURE NO: 1

**Woodward-Clyde Consultants**

CONSULTING ENGINEERS, GEOLOGISTS AND ENVIRONMENTAL SCIENTISTS

## **Appendix A**



TELEX NO.: 98-64-31  
CABLE ADDRESS: FIRESTONE, AKRON (OHIO).

August 11, 1986

Jennie J. Tuckerman  
Ohio E.P.A.  
Northeast District Office  
2110 E. Aurora Road  
Twinsburg, OH 44087-1969

RE: Firestone Tire & Rubber Co.  
OHD 001288109  
#02-77-0325  
Closure Plan

Dear Mrs. Tuckerman:

Attached please find our closure plan revised as discussed by phone conversation this morning.

Again we wish to thank you for your assistance.

Sincerely,

D. C. McMillen  
Coordinator, Hazardous Waste

DCM: jkj  
Attachment

cc: R. E. Jereb/Closure file w/attach.



TO MEMORANDUM

FROM D. C. MC MILLEN

DATE AUGUST 11, 1986

SUBJECT AKRON WORLD HEADQUARTERS FACILITY USEPA ID #OHDO01288109  
SUB PART G. CLOSURE AND POST CLOSURE - (OAC-3745-55-11 TO 15) AND  
PERMIT #02-77-0325 (OAC-3745-55-17 TO 20)

Present permitted storage facility is of concrete construction, 20 ft. X 10 ft. in size. The design of construction is monolithic, (single pour) as footer, pad, dike walls and ramps were poured at the same time, to eliminate any joints.

Footer at base of pad is approximately 4 ft. deep and dike walls are 8 inches thick by 8 inches high, with an 8 inch thick pad. Wire mesh and re-bar were used for reinforcement. The storage pad is located South West of our World Headquarters Building and the surrounding area is asphalt pavement.

Location of the hazardous waste storage facility is indicated on the attached topographic map and also on the Firestone drawing AKC 33001-3 also attached. Drawing WHB 21003-1 (attached) shows the construction of the storage pad.

The reason for closing our permitted storage facility is that we no longer produce tires and rubber products in our World Headquarters Building and consequently do not generate enough hazardous waste to warrant keeping a permitted facility.

Our Akron, Ohio, World Headquarters Facility is primarily a Corporate Office Building with Laboratories and Work Shops for the development of rubber compounds and tire related machinery.

After closure we will operate as a generator and comply with regulations pertaining to a generator and comply with the less than 90 day requirements.

#### Description of Wastes

D-001 - Wastes are mixtures of rubber solvents and cements. The constituents being gasoline and blended hydrocarbon solvents.

F-001/F-002 - Mixtures of halogenated solvents, which are 1, 1, 1, -tri chloroethane, methylene chloride, chloroform and ortho-dichloro benzene.

F-003 - Mixtures of non-halogenated solvents, which are xylene, acetone and methanol.

F-004 - Mixtures of non-halogenated solvents which are cresol and cresylic acid.

F-005 - Mixtures of non-halogenated solvents which are toluene and methyl ethyl ketone.

The anticipated amount of waste in storage at closure would be one 55 gallon drum or 55 gallons, which would be a mixture of all above wastes. Percentages would be estimated as D-001 - 60%, F-001 - 05%, F-002 - 05%, F-003 - 10%, F-004 - 15%, and F-005 - 05%.

The time table after receiving approval for effecting our closure would be as follows:

Within 20 days after approval, waste will be disposed of off site.

Within 60 days after approval, storage pad will be decontaminated. Rinsate will have been sampled and disposed of properly.

Within 90 days after approval, certification by Firestone professional engineer and independant professional engineer would be forwarded to O.E.P.A.

Details of closure are as follows:

1 - Disposal of wastes remaining in storage by day 20.

Transportation	=	\$	300.00
Disposal	=		200.00

2 - Decontamination of concrete slab.

- Pressure wash with detergent (trade name Dun-E-Z) drum first rinsate as a hazardous waste.

- Pressure wash with detergent a second time and drum rinsate.

Wadsworth Alert, Inc. will sample and analyze second rinse. If less than 1 MG/L of any R.C.R.A. regulated solvent is achieved, slab will be considered clean, if not, process will be repeated until less than 1 MG/L is attained. Rinsate will be properly disposed of after analysis.

Rubber boots, rubber gloves, face shields and disposable coveralls would be used by employees during decontamination process, and properly disposed of after use. Equipment would be decontaminated by hand washing, after decontamination process is complete, and wash material properly disposed of as a hazardous waste.

Decontamination	=	\$	2,500.00
Transportation of			
rinsate	=		400.00
Disposal of rinsate	=		600.00



- 3 - Wadsworth Alert - sample and analyze = \$1,000.00

Recommended procedures for testing are per attached analytical method list by Wadsworth Alert Laboratories, Inc. The parameters listed are the previously stored wastes. The matrix being our rinsate. By day 60.

- 4 - Woodward-Clyde Consultants will supervise the decontamination process and furnish closure certification. = \$3,000.00

Certification by Firestone professional engineer and independent professional engineer to be forwarded to O.E.P.A. by day 90.

Post closure care would not apply due to the fact that no hazardous waste would remain.

*D.C. McMillen*

COORDINATOR, HAZARDOUS WASTE  
WHQ MAINTENANCE

DCM:jkj  
Attachment

# FIRESTONE WORLD HEADQUARTERS CLOSURE SCHEDULE

## Task

1 - Removal, transportation  
and disposal of  
remaining waste

2 - Decontamination of  
storage facility

3 - Sample and analyze  
rinsate - transportation  
and disposal of rinsates

4 - Supervision and  
certification by Firestone  
and independant profess-  
ional engineers

0

10

20

30

40

50

60

70

80

90

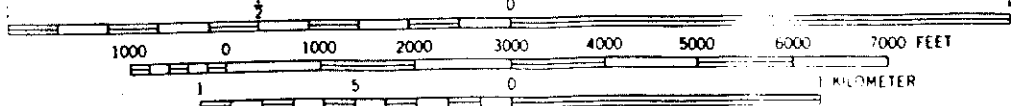
Time in Days

Date of Approval





SCALE 1:24000



CONTOUR INTERVAL 10 FEET

3004

AKC-33005

HAZARDOUS WASTE  
STORAGE PAD

POWER  
HOUSE

BURGER IRON CO.

PLANT ONE

SHIPPING  
BUILDING

LABOR

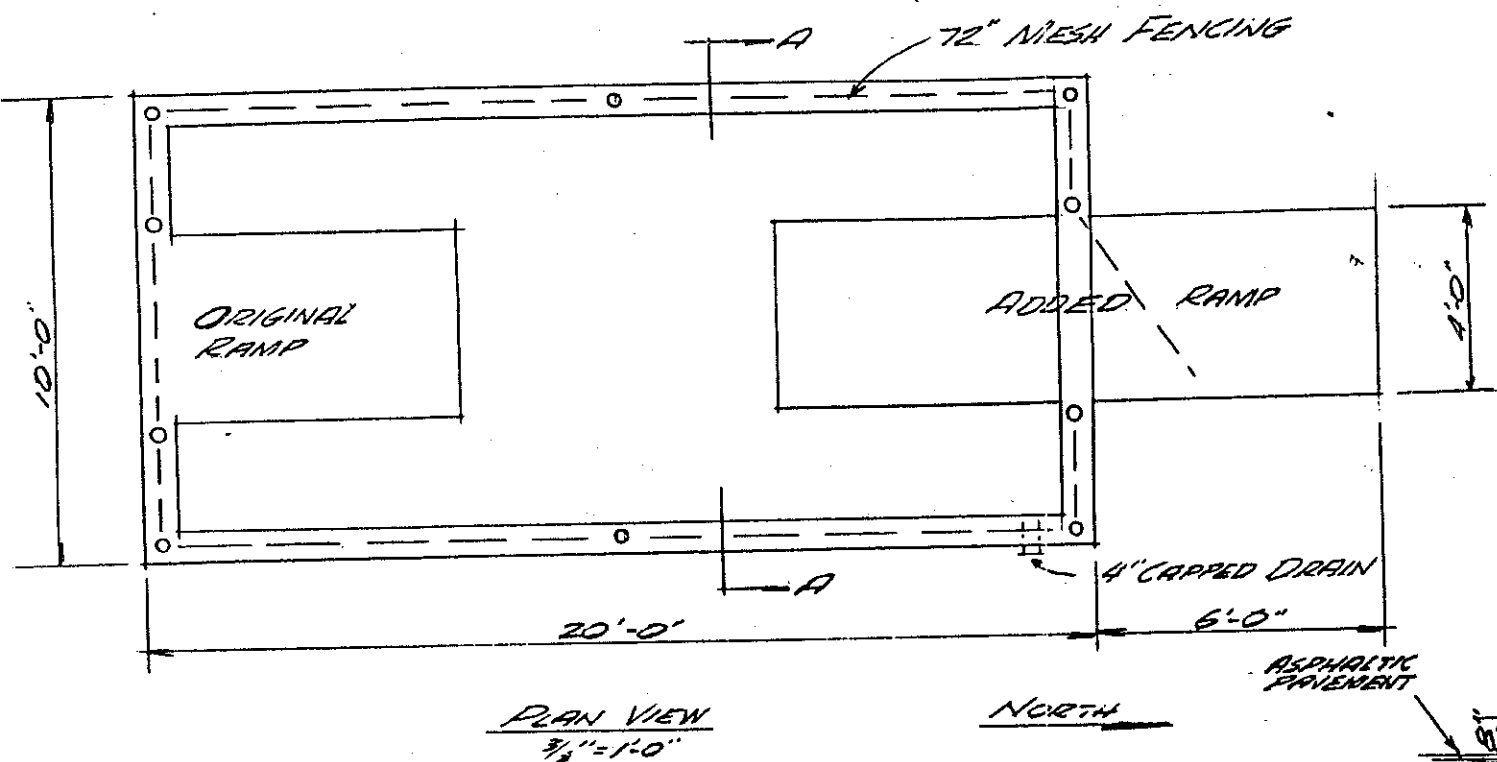
CLUB  
HOUSE

SOUTH MAIN STREET

SCALE : 200 : 1



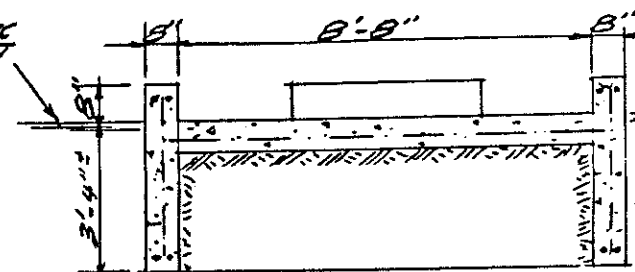
780-A-AKC-33001 | 3 |



PLAN VIEW  
3/8" = 1'-0"

NORTH

ASPHALTIC  
PAVEMENT



SECTION A-A

3/8" = 1'-0"

CONCRETE PAD FOR  
HAZARDOUS WASTE DRUMS

- NOTES:
1. PLACEMENT OF CONCRETE BY CONTINUOUS METHOD TO AVOID JOINTS.
  2. REINFORCING USED WAS WIRE MESH.

REV. BY	DATE
CWR	7/2/88
REDRAWN PER FIELD MEAS./ DISCUSSION WITH CONTRACTOR	
1	

This Drawing is the property of  
The Firestone Tire & Rubber Co.

This drawing is loaned on the express condition that it is not to be used in any way deleterious to the interests of The Firestone Tire & Rubber Company. The acceptance of this drawing will be construed as an acceptance of the foregoing condition, and as an admission of the exclusive ownership in and to the drawing by The Firestone Tire & Rubber Company.

THE **Firestone** TIRE & RUBBER CO.

DRAWN <i>CWR</i>		APPROVED _____		DATE <i>7/2/11</i>	
CHECKED _____		PROJ. ENG. _____		SCALE <i>3/8"</i>	
PLANT	SIZE	DEPT.	SERIES		
<i>TOOB</i>	<i>B</i>	<i>WHB</i>	<i>21003</i>		



State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049  
(614) 466-8565

RECEIVED

SEP 25 1986

W L POLING



Richard F. Celeste, Governor

CERTIFIED MAIL

September 24, 1986

Re: CLOSURE PLAN, FIRESTONE TIRE AND  
RUBBER COMPANY  
OHD001288109

Mr. D.C. McMillen  
Firestone Tire and Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44317

Mr. McMillen:

On March 6, 1986, the Firestone Tire and Rubber Company submitted to Ohio EPA a closure plan for the hazardous waste drum storage area located at 1200 Firestone Parkway, Akron, Ohio. Revisions to the closure plan were received on August 11, 1986. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that Firestone Tire and Rubber Co.'s proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of Firestone Tire and Rubber Co. in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at Firestone Tire and Rubber Co. meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by Firestone Tire and Rubber Co. is hereby approved.

Please be advised that approval of this closure plan does not release Firestone Tire and Rubber Co. from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Due to the fact that the Ohio EPA is not currently authorized to conduct the federal hazardous waste program in Ohio, your closure plan also must be reviewed and approved by USEPA. Federal RCRA closure regulations (40 CFR 265.112) require that you submit a closure plan to George Hamper, Chief, Waste

Ohio Environmental Protection Agency

ENTERED DIRECTOR'S JOURNAL

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: David Davis Date: 9/24/86

SEP 24 1986



Mr. McMillen  
Page Two  
September 24, 1986

Management Division, Technical Programs Section, Ohio Unit, USEPA, Region V, 5HW-13, 230 South Dearborn Street, Chicago, Illinois 60604. Approval by both agencies is necessary prior to commencement of activities required by the approved closure plan.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 250 East Town Street, Room 101, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: James Flautt, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43216-1049.

Ohio Environmental Protection Agency  
ENTERED DIRECTOR'S JOURNAL

SEP 24 1986

  
Warren W. Tyler

DF/ara

cc: James Flautt, DSHWM  
George Hamper, USEPA, Region V  
Rebecca Strom, USEPA, Region V  
Jennie Tuckerman, NEDO, Ohio EPA

1370U

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Quinn Owens Date 9/24/86

cc: Russ Chambers  
W.L. Poling  
J.R. Laman/A.H. King

NOTE: NO FURTHER ACTION  
NECESSARY ON OUR PART,  
PER REBECCA STROM REGION II  
WAITING FOR REGION II  
ACTION ON O.E.P.A. APPROVAL

RECORDED 9/26/86



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF.

OCT 08 1986

RECEIVED

5HS-JCK-13

OCT 16 1986

W. I. POLING

Mr. David C. McMillen  
Firestone Tire and Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44137

RE: Closure Plan  
Firestone Tire and Rubber Company  
OHD 001 288 109

Dear Mr. McMillen:

The U.S. Environmental Protection Agency (U.S. EPA) received a copy of the above-referenced facility's closure plan on August 18, 1986. This plan was previously submitted to the Ohio Environmental Protection Agency (OEPA) on March 6, 1986. The plan concerned the closure of a hazardous waste container storage area located at the facility.

The OEPA approved the plan conditionally in a letter dated September 24, 1986. The U.S. EPA concurs with the OEPA's review and approval with the conditions stipulated.

If you have any further questions, please contact Ms. Rebecca Strom of my staff, at (312) 886-6194.

Sincerely,

Karl E. Bremer, Chief  
Technical Programs Section

cc: Tony Sassoon, OEPA  
Tom Carlisle, OEPA  
Tom Crepeau, OEPA  
Jennie Tuckerman, OEPA-NEDO

CC:

R.W. CHAMBERS  
W.L. POLING  
J.R. LAMON / AH KING



State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049  
(614) 466-8565



Richard F. Celeste, Governor

August 13, 1986

Re: Firestone Tire & Rubber Co.  
US EPA ID No.: OHD001288109  
Ohio I.D. No.: 02-77-0325  
Closure Plan

Firestone Tire & Rubber Co.  
Attn: David C. McMillen  
1200 Firestone Parkway  
Akron, Ohio 44137

Dear Sir:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for Firestone Tire & Rubber Company in Akron, Ohio will appear the week of August 17, 1986, in the Akron Beacon Journal in Akron, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, September 19, 1986.

Copies of the closure plan will be available for public review at the Akron-Summit County Public Library, 55 S. Main Street, Akron, Ohio 44326 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

Please contact James F. Flautt at (614) 466-1578, if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau  
Division of Solid & Hazardous Waste Management

TEC/dhs

cc: George Hamper, U.S. EPA, Region V  
Rebecca Strom, U.S. EPA, Region V  
Jennie Tuckerman, OEPA, NEDO

1013R

PUBLIC NOTICE

Summit County



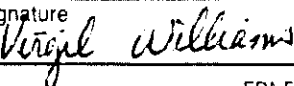
RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: Firestone Tire & Rubber Company, US EPA ID No.: OHD001288109, Ohio ID No: 02-77-0325, 1200 Firestone Parkway, Akron, Ohio 44337. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Akron-Summit County Public Library, 55 S. Main Street, Akron, Ohio 44326 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Attn: Data Management Section, Box 1049, 361 E. Broad Street, Columbus, Ohio 43216-1049.

## **Appendix B**

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. OHD 001288109		Manifest Document No 00006		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
		3. Generator's Name and Mailing Address <b>THE FIRESTONE TIRE &amp; RUBBER CO. 1200 FIRESTONE PARKWAY, AKRON, OH 44317</b>						A. State Manifest Document Number					
4. Generator's Phone ( 216 ) 379-7350						B. State Generator's ID							
5. Transporter 1 Company Name <b>CHEM-FREIGHT, INC.</b>				6. US EPA ID Number OHD 075006304		C. State Transporter's ID							
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone 216/439-2955							
9. Designated Facility Name and Site Address <b>ERIEWAY, IN C. 33 INDUSTRY DRIVE BEDFORD, OHIO 44146</b>				10. US EPA ID Number OHD 055522429		E. State Transporter's ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone 216/439-2955							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
						No.	Type						
a. <input checked="" type="checkbox"/> Waste flammable solvents N.O.S. NA 1993						1		DM		400		P	
X flammable liquid EPCO #7647										55		G	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above  Flash Point 20° F  WO/35502 PC 2 TSDF 85 EPCO 7647 CUS # 0522						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information  P.O. # AM 00145 REM													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
Printed/Typed Name D. K. Robinson, Jr.					Signature 			Month Day Year 10 27 86					
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name FRED BOSTIC					Signature 			Month Day Year 10 27 86					
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name					Signature			Month Day Year					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name VIRGIL WILLIAMS					Signature 			Month Day Year 10 27 86					



COMPANY: Firestone World Hdqtrs.  
Facility Engineering  
ADDRESS: 1200 Firestone Pkwy.  
Akron, Ohio 44317 /Dept. 735

ATTENTION: Dave McMillan

### CERTIFICATE OF DISPOSAL

This is to document the disposition of waste material(s) removed from your facility on 3/5/87

A. The waste consisted of:

Waste rinseate EPCO #9485

(79 ppm methanol) non-hazardous

B. Material(s) were trucked by:

Name: Chem-Freight, Inc.

Address: 6600 Bessemer Ave

PERMIT NO. OH 33HW

Cleveland, Ohio 44125

EPA I.D. OHD 075006304

C. Material(s) were disposed of at:

Name: Fondessy

Address: Otter Creek Rd., Oregon, Ohio

D. Disposal of your waste was accomplished by the following method(s):

~~Solidification (T21) prior to disposal.~~

E. Date of Disposal: March, 1987

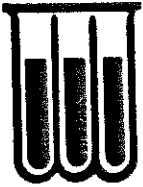
We appreciate your business.

Very truly yours,

*Clare Eden*

Officer of Company  
ERIEWAY, INC.

## **Appendix C**



WADSWORTH/ALERT  
LABORATORIES, INC.

Sampling, testing,  
consulting, mobile labs

July 17, 1986

HEADQUARTERS AND  
LABORATORY  
1600 Fourth Street, S.E.  
P.O. Box 208  
Canton, OH 44701  
(216) 454-5809

LABORATORY  
2121 Fourth Street, S.E.  
Canton, OH 44701  
(216) 454-1703

SOUTHEASTERN  
REGIONAL OFFICE  
744 Sunset Boulevard  
West Columbia, SC 29169  
(803) 794-6251

REGIONAL  
LABORATORY  
Route 3 - Box 235  
Bartow, FL 33830  
(813) 533-2150  
(Shipping address)  
Avenue D North  
Bartow Municipal Airport  
Bartow, FL 33830

24-Hour ALERT line  
(216) 454-8304  
In Ohio Call:  
800-544-5588

Firestone Tire and Rubber Co.  
1200 Firestone Parkway  
Akron, Ohio 44317

Attention: Mr. Bob Jereb

Dear Mr. Jereb:

Please find the enclosed methods list for the Rinse-water Decontamination Project which we recently discussed on the telephone. The list contains the parameters to be reported for the project along with each associated method.

Please feel free to call me if you have any questions concerning this or any other project which may require environmental testing.

Sincerely,

WADSWORTH/ALERT LABORATORIES, INC.

Timothy Lavey  
Project Manager

TL:ph

Enclosure





WADSWORTH/ALERT  
LABORATORIES, INC.

# ANALYTICAL METHOD LIST

<u>Matrix</u>	<u>Parameter</u>	<u>Method</u>
Wastewater	Methanol	NIOSH S59, modified
	1,1,1-Trichloroethane	SW846 Method 8240
	Methylene Chloride	SW846 Method 8240
	Chloroform	SW846 Method 8248
	1,2-Dichlorobenzene	SW846 Method 8240
	Xylenes	SW846 Method 8240
	Toluene	SW846 Method 8240
	Acetone	SW846 Method 8240
	2-Butanone	SW846 Method 8240
	Gasoline as BTX	SW846 Method 8240
	ortho-Cresol	SW846 Method 8270
	meta-Cresol	SW846 Method 8270
	para-Cresol	SW846 Method 8270
	Cresylic Acid	SW846 Method 8270



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800-544-5588

**ANALYTICAL REPORT**

**Presented to :**

**BOB JEREB**

**FIRESTONE TIRE & RUBBER**

**WADSWORTH/ALERT LABORATORIES, INC.**

Tim Lavey  
Project Manager

Marvin W. Stephens, Ph. D.  
Vice President & Director General Laboratory Program

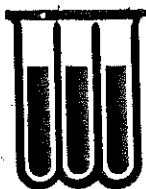
11/25/86





WADSWORTH/ALERT  
LABORATORIES, INC.





WADSWORTH/ALERT  
LABORATORIES, INC.

ORGANIC COMPOUNDS ANALYTICAL REPORT

COMPANY : FIRESTONE TIRE & RUBBER  
LABORATORY ID : 5371-23879  
SAMPLE MATRIX : WATER

RECEIVING DATE : 10/28/86

ANALYSIS DATE : 11/ 4/86

SAMPLE ID : SCNDRNSE 10/28/86

	RESULT (ug/L )	DETECTION LIMIT
Methylene chloride	ND	10
Acetone	ND	10
Chloroform	5 J	10
2-Butanone	ND	10
Benzene	ND	10
Toluene	ND	10
Total Xylenes	ND	10
Methanol	36,000	1,500
1,2-Dichlorobenzene	ND	10
1,1,1-Trichloroethane	ND	10

ND - NONE DETECTED

J - ESTIMATED CONCENTRATION QUANTITY BELOW DETECTABLE LIMIT



WADSWORTH/ALERT  
LABORATORIES, INC.

ACID COMPOUNDS ANALYTICAL REPORT

COMPANY : FIRESTONE TIRE & RUBBER  
LABORATORY ID : 5371-23879  
SAMPLE MATRIX : WATER

RECEIVING DATE : 10/28/86  
EXTRACTION DATE : 10/31/86  
ANALYSIS DATE : 11/ 5/86

SAMPLE ID : SCNDRNSE 10/28/86

	RESULT (ug/L )	DETECTION LIMIT
4-Chloro-3-methylphenol	ND	10
2-Chlorophenol	ND	10
2,4-Dichlorophenol	ND	10
2,4-Dimethylphenol	ND	10
2,4-Dinitrophenol	ND	50
2-Methyl-4,6-dinitrophenol	ND	50
2-Nitrophenol	ND	10
4-Nitrophenol	ND	50
Pentachlorophenol	ND	50
Phenol	ND	10
2,4,6-Trichlorophenol	ND	10
Ortho-Cresol	ND	10
Meta-Cresol	ND	10
Para-Cresol	ND	10
Cresylic Acid	ND	10



WADSWORTH/ALERT  
LABORATORIES, INC.

OTHER COMPOUNDS PRESENT

COMPANY : FIRESTONE TIRE & RUBBER  
SAMPLE ID : SCNDRNSE 10/28/86  
LABORATORY ID : 5371-23879  
SAMPLE MATRIX : WATER  
RECEIVING DATE : 10/28/86  
EXTRACTION DATE : 11/ 5/86  
ANALYSIS DATE : 11/ 5/86

Non-listed Quantified Compounds

MS/DS Identified Non-regulated Compounds With Their Estimated Concentrations

2-Butoxyethanol	100 ug/L
Aliphatic hydrocarbons (8 peaks)	400 ug/L



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Bartow Municipal Airport  
Bartow, FL 33830

24-Hour ALERT line  
(216) 454-8304  
In Ohio Call:  
800-544-5588

**ANALYTICAL REPORT**

**Presented to :**

**DAVE McMILLEN**

**FIRESTONE TIRE & RUBBER**

**WADSWORTH/ALERT LABORATORIES, INC.**

**Tim Lavey  
Project Manager**

**Marvin W. Stephens, Ph. D.  
Vice President & Director General Laboratory Program**

11/17/86





WADSWORTH/ALERT  
LABORATORIES, INC.



WADSWORTH/ALERT  
LABORATORIES, INC.

ORGANIC COMPOUNDS ANALYTICAL REPORT

COMPANY : FIRESTONE TIRE & RUBBER  
LABORATORY ID : 5435-24117  
SAMPLE MATRIX : WATER

RECEIVING DATE : 10/31/86

ANALYSIS DATE : 11/ 4/86

SAMPLE ID : COMP. 1ST & 2ND RINSE 10/31/86

	RESULT (ug/L )	DETECTION LIMIT
Methylene chloride	ND	50
Acetone	ND	50
Chloroform	ND	50
2-Butanone	ND	50
1,1,1-Trichloroethane	ND	50
Toluene	ND	50
Total Xylenes	ND	50
Methanol	79,000	1,500
1,2-Dichlorobenzene	ND	50

ND - NONE DETECTED





WADSWORTH/ALERT  
LABORATORIES, INC.

OTHER COMPOUNDS PRESENT

COMPANY : FIRESTONE TIRE & RUBBER  
SAMPLE ID : COMP. 1ST & 2ND RINSE 10/31/86  
LABORATORY ID : 5435-24117  
SAMPLE MATRIX : WATER  
RECEIVING DATE : 10/31/86  
  
ANALYSIS DATE : 11/ 6/86

Non-listed Quantified Compounds

MS/DS Identified Non-regulated Compounds With Their Estimated Concentrations

2-Propanol

320 ug/L



WADSWORTH/ALERT  
LABORATORIES, INC.

BASE NEUTRAL COMPOUNDS ANALYTICAL REPORT

COMPANY : FIRESTONE TIRE & RUBBER  
LABORATORY ID : 5435-24117  
SAMPLE MATRIX : WATER

RECEIVING DATE : 10/31/86  
EXTRACTION DATE : 11/ 5/86  
ANALYSIS DATE : 11/ 6/86

SAMPLE ID : COMP. 1ST & 2ND RINSE 10/31/86

	RESULT (ug/L )	DETECTION LIMIT
Acenaphthene	ND	500
Acenaphthalene	ND	500
Anthracene	ND	500
Benzidine	ND	2,500
Benzo(a)anthracene	ND	500
Benzo(b)fluoranthene	ND	500
Benzo(k)fluoranthene	ND	500
Benzo(ghi)perylene	ND	500
Benzo(a)pyrene	ND	500
Bis(2-chloroethoxy)methane	ND	500
Bis(2-chloroethyl)ether	ND	500
Bis(2-chloroisopropyl)ether	ND	500
Bis(2-ethylhexyl)phthalate	ND	500
4-Bromophenyl phenyl ether	ND	500
Butyl benzyl phthalate	ND	500
2-Chloronaphthalene	ND	500
4-Chlorophenyl phenyl ether	ND	500
Chrysene	ND	500
Dibenzo(a,h)anthracene	ND	500
Bi-n-butyl phthalate	ND	500
1,2-Dichlorobenzene	ND	500
1,3-Dichlorobenzene	ND	500
1,4-Dichlorobenzene	ND	500
3,3'-Dichlorobenzidine	ND	2,500
Diethyl phthalate	ND	500
Dimethyl phthalate	ND	500
2,4-Dinitrotoluene	ND	500
2,6-Dinitrotoluene	ND	500
Di-n-octyl phthalate	ND	500
Fluoranthene	ND	500
Fluorene	ND	500
Hexachlorobenzene	ND	500
Hexachlorobutadiene	ND	500
Hexachlorocyclopentadiene	ND	500
Hexachloroethane	ND	500
Ideno(1,2,3-CD)pyrene	ND	500
Isophorone	ND	500
Naphthalene	ND	500
Nitrobenzene	ND	500
N-Nitrosodimethylamine	ND	500
N-Nitrodosiphenylamine	ND	500
N-Nitrosodi-n-propylamine	ND	500
Phenanthrene	ND	500
Pyrene	ND	500
1,2,4,Trichlorobenzene	ND	500



WADSWORTH/ALERT  
LABORATORIES, INC.

ACID COMPOUNDS ANALYTICAL REPORT

COMPANY : FIRESTONE TIRE & RUBBER  
LABORATORY ID : 5435-24117  
SAMPLE MATRIX : WATER

RECEIVING DATE : 10/31/86  
EXTRACTION DATE : 11/ 5/86  
ANALYSIS DATE : 11/ 6/86

SAMPLE ID : COMP. 1ST & 2ND RINSE 10/31/86

	RESULT (ug/L )	DETECTION LIMIT
4-Chloro-3-methylphenol	ND	500
2-Chlorophenol	ND	500
2,4-Dichlorophenol	ND	500
2,4-Dimethylphenol	ND	500
2,4-Dinitrophenol	ND	2,500
2-Methyl-4,6-dinitrophenol	ND	2,500
2-Nitrophenol	ND	500
4-Nitrophenol	ND	2,500
Pentachlorophenol	ND	2,500
Phenol	ND	500
2,4,6-Trichlorophenol	ND	500
Ortho-Cresol	ND	500
Meta-Cresol	ND	500
Para-Cresol	ND	500
Cresylic Acid	ND	500

ND - NONE DETECTED



WADSWORTH/ALERT  
LABORATORIES, INC.

OTHER COMPOUNDS PRESENT

COMPANY : FIRESTONE TIRE & RUBBER  
SAMPLE ID : COMP. 1ST & 2ND RINSE 10/31/86  
LABORATORY ID : 5435-24117  
SAMPLE MATRIX : WATER  
RECEIVING DATE : 10/31/86  
EXTRACTION DATE : 11/ 5/86  
ANALYSIS DATE : 11/ 6/86

Non-listed Quantified Compounds

MS/DS Identified Non-regulated Compounds With Their Estimated Concentrations

2-Butoxyethanol	200,000 ug/L
Trimethylcyclohexanemethanol	4,000 ug/L
Trimethylcyclohexenemethanol	20,000 ug/L
Phenoxyethoxy ethoxyethanol (2 peaks)	6,000 ug/L



WADSWORTH/ALERT  
LABORATORIES, INC.

ANALYTICAL REPORT

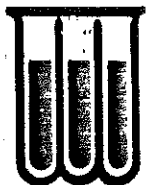
COMPANY : FIRESTONE TIRE & RUBBER  
LABORATORY ID : 5435-24117  
SAMPLE MATRIX : WATER

RECEIVING DATE : 10/31/86

SAMPLE ID : COMP. 1ST & 2ND RINSE 10/31/86

PARAMETER	RESULT	DETECTION LIMIT
Flash Point	>180 Deg. F	

ND - NONE DETECTED



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LABORATORIES, INC.

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Since 1938

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### ANALYTICAL REPORT

Presented to :

DAVE MCMILLEN

FIRESTONE TIRE & RUBBER

WADSWORTH/ALERT LABORATORIES, INC.

Tim Lavey  
Project Manager

Marvin W. Stephens, Ph. D.  
Vice President & Director General Laboratory Program

January 14, 1987



CORPORATE AND LABORATORY: Canton, Ohio (216) 454-5809

LABORATORY: Cleveland, Ohio (216) 642-9151

LABORATORY: Bartow, Florida (813) 533-2150

SOUTHEAST REGIONAL OFFICE: Lexington, South Carolina (803) 957-6590

24-HOUR ALERT LINE: (216) 454-8304





WADSWORTH/ALERT  
LABORATORIES, INC.



WADSWORTH/ALERT  
LABORATORIES, INC.

GAS CHROMATOGRAPH ANALYSIS REPORT

COMPANY : FIRESTONE TIRE & RUBBER  
LABORATORY ID : 5895-25765  
SAMPLE MATRIX : WATER

RECEIVING DATE : 12/ 3/86

SAMPLE ID : RINSE 1-1,2,3 12/3/86

PARAMETER	RESULT (mg/L )	DETECTION LIMIT
METHANOL	ND	1

ND - NONE DETECTED

# WADSWORTH/ALERT LABS

P. O. BOX 208  
CANTON, OH 44701  
(216) 454-8304

## CHAIN-OF-CUSTODY RECORD

No 921

PROJECT LOCATION		NAME OF CLIENT		PROJECT TELEPHONE NO		PROJECT NUMBER		
FIRESTONE T&R		Woodward-Clyde Consultants		(216) 349-2708		86C3551		
ITEM NUMBER	SAMPLE NUMBER	NUMBER & SIZE OF CONTAINERS	DESCRIPTION		TRANSFER NUMBER & CHECK			
1	SCNDRNGE-1-1	VOA'S	SEE ATTACHED SHEET FOR ANALYSIS  QUESTIONS : Call Tim King (216) 349-2708		1	2	3	
2	" -1-2	↓			4	5	6	7
3	" -2-1	↓						
4	" -2-2	↓						
5	SCNDRNGE-3	<del>1000</del> ml (amber)						
6	↓ -4	↓						
7	↓ -5	↓						

Person Responsible for sample	Affiliation	Date	Time	TRANSFER NUMBER	ITEM NUMBER	TRANSFERS RELINQUISHED BY	ACCEPTED BY	DATE	TIME
TIM KING	WCC	10/28		1	ALL	Tim King	Joe Dyer	10/28	9:40g
Purpose of analysis (use back of front sheet if necessary) Closure Documentation of Hazardous Mat. Storage Area				2	ALL	Joe Dyer	James E. Robinson	10/28	9:45
				3	ALL	James E. Robinson	Brad Carter	10/28	11:00
				4	1-7	Brad Carter	Brad Carter	10/28	1:00
				5					

## **Appendix D**



**Photo 1** Hazardous Waste Storage Area before washing took place.



**Photo 2** Solid debris was swept up before cleaning started.



Photo 3 Landa high-pressure washer used to clean the pad.



Photo 4 Detergent washing of pad area (First Cycle).





**Photo 5** View of pad area after first cycle rinse.



**Photo 6** Second cycle detergent wash.





**Photo 7** View of pad after final rinse (Second Cycle).



**Photo 8** Wash water was collected from the outlet shown and deposited in the 55-gallon drum. Samples of the final rinse water were collected at this outlet.

ENVIRONMENTAL PROTECTION AGENCY  
TECHNICAL ENFORCEMENT SUPPORT AT  
HAZARDOUS WASTE SITES

TES IV  
CONTRACT NO. 68-01-7351  
WORK ASSIGNMENT NO. 505

LAND DISPOSAL RESTRICTION INSPECTIONS  
FIRESTONE WORLD HEADQUARTERS  
AKRON, OHIO  
EPA REGION V

JACOBS ENGINEERING GROUP INC.  
PROJECT NO. 05-B505-00

PREPARED BY:

METCALF & EDDY  
6480 BUSCH BOULEVARD, SUITE 120  
COLUMBUS, OHIO 43229

Facility: FIRESTONE WORLD HEADQUARTERS  
1200 FIRESTONE PARKWAY  
AKRON, OHIO 44317

October 15, 1987

Ms. Catherine McCord  
U.S. EPA Enforcement Division  
Region V  
230 S. Dearborn Street (5-H)  
Chicago, Illinois 60604

RE: Land Ban Inspection  
Firestone World Headquarters  
1200 Firestone Parkway  
Akron, Ohio 44317

001 288 109

Dear Ms. McCord:

On September 30, 1987, Metcalf & Eddy inspected Firestone World Headquarters under Work Assignment 505 for the U.S. EPA, Region V. This land ban inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended.

The Metcalf & Eddy team consisted of Dennis DeNiro and Marsha Bates. Mr. David McMillen, Coordinator of Hazardous Waste for Firestone's Corporate Headquarters, met with Metcalf & Eddy personnel and provided assistance throughout the inspection.

When we met with Mr. McMillen he was given the letter from U.S. EPA which introduced Metcalf & Eddy as U.S. EPA representatives. Dennis DeNiro explained that the purpose of our visit was to look at the facility's solvent waste stream and how that waste is handled.

Mr. McMillen explained that the Chemical Laboratories in the facility are experimental labs. At one time, the labs were classical bench chemistry labs; however, now they are instrument labs. As a result, the quantity of wastes shipped are minor. Two drums have been shipped in 1987: one from the analytical lab and one from the paint shop.

Mr. McMillen said that as the waste is generated in the analytical lab, it is poured into one of several 5 gallon cans which are stored in safety cabinets. When the 5 gallon cans are full, they are emptied into a fire safety drum, which is stored on the second floor. When that drum is full, Mr. McMillen is contacted. He arranges the removal of the drum within 3 days. Usually, the drum is moved from the accumulation area to the shipping dock for immediate transport by Erieway, a RCRA hazardous waste transporter. However, there is a drum storage



October 15, 1987

area in the basement where the drums can be stored until transport can be arranged.

The wastes from the analytical lab are placed in 5 gallon cans which are marked "F001", "F005", etc. Erieway, the hazardous waste transporter, is given a percentage of how much of each type of waste are in the drums, but no specific analysis of the contents is done. Mr. McMillen reported that Erieway has requested an analysis of the drum contents in the future.

The Advanced Technologies Laboratories generates a waste which contains a small amount of formaldehyde. The waste is spent cord dip solution and fabric which has been dipped into the solution. Erieway also handles that waste, which Firestone has classified as F008.

Every 2 or 3 years, lab packs may be generated. Their disposal depends on the content of the packs. Mr. McMillen also mentioned that wastes which are considered hazardous are sometimes found in odd corners of the building. Those wastes are disposed in accordance with regulations.

After Mr. Mcmillen explained the waste stream and the method of handling the wastes, he showed M&E personnel the 5 gallon containers where the lab workers place the solvents, the area where the formaldehyde wastes are generated, the 2nd floor area where the solvent accumulation drum is stored, and the waste storage area in the basement. Because of the experimental nature of the facility, M&E personnel were asked to take pictures only of the storage facility in the basement.

While in the laboratory, besides looking at the 5 gallon containers used to accumulate the solvents, M&E personnel also examined a log of the contents of the 5 gallon cans. A copy of a typical sheet (which shows the class of the material, the amount, and the date placed in the waste accumulation drum) is included in the attachments. The lab chemist said the typical wastes are xylene, methyl ethyl ketone, and toluene.

After leaving the analytical lab, the waste accumulation drum, which is stored in a fire cabinet, was inspected. The drum was labeled and had all 3 types of wastes marked on the label (D001, F005, F003). No inspection log is kept for the waste accumulation drum since people are in the room daily. Ohio EPA has approved this practice, according to Mr. McMillen. *← wrong*

The paint shop drum was inspected. It was in a cabinet and was marked "used solvent". The drum was closed and a funnel for adding solvent was on the closed lid. The label was completed except for the date which would be marked once the drum is full. *← wrong*

Ms. Catherine McCord

3

October 15, 1987

The basement drum storage area was inspected. The drum in storage at that time was closed, marked D001, and dated 9/15/87. The secured room is checked daily by the fire department. A CO<sub>2</sub> extinguisher system is in place outside the room. Photograph 1 shows the closed drum (with a funnel lying on top). Photograph 2 shows the hazardous waste sign outside the room.

After the visual inspection, the land ban checklist was completed. Dennis DeNiro explained that a letter report will be submitted to U.S. EPA and will include a summary of the inspection, copies of the waste handling documents, and the photographs taken on-site.

Those items are included in the attachments. The land ban checklist is also included.

Please call if you have comments or questions.

Sincerely,

Dean Geers  
Regional Manager

DG:MB:vh

Enclosures

ATTACHMENT 1  
(2) UNIFORM HAZARDOUS WASTE MANIFESTS

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

Generator's Name and Mailing Address

FIRESTONE TIRE & RUBBER CO.  
1200 FIRESTONE PARKWAY, AKRON OHIO 44317

4. Generator's Phone (216) 379 7350

5. Transporter 1 Company Name

CHEM FREIGHT INC.

6. US EPA ID Number

OH0075006304

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

ERIEWAY INC.  
33 INDUSTRY DRIVE  
BEUFORD OHIO

10. US EPA ID Number

OH0055522429

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone 216-341-2500

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

216-439-1257

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers  
No. Type

13. Total  
Quantity

14. Unit  
Wt/Vol

1. Waste No.

a. ☒ WASTE FLAMMABLE LIQUID, NO. 5  
UN 1993 (F003, D001, F005)

1 1 DM

350 49

P 6

F005  
D001  
F003

b.   
c.   
d.

J. Additional Descriptions for Materials Listed Above

P.O. # AM00446 TEM (EPCO-0435A)  
WONO 35675 PC (2) EPCO 0435A

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

X DAVID McMillen

Signature

X David McMillen

Month Day Year

06 11 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

ROBERT BLUMENTHAL

Signature

Robert Blumenthal

Month Day Year

06 11 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

VIRGIL WILLIAMS

Signature

Virgil Williams

Month Day Year

06 11 87



base print or type. (Form designed for use on elite (12-pitch), typewriter.)

**UNIFORM HAZARDOUS  
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1  
of 1Information in the shaded areas  
is not required by Federal law.

OHD 001288109

36426

3. Generator's Name and Mailing Address

Firestone World Headquarters

1200 Firestone Parkway  
Akron, OH 44317

4. Generator's Phone (216) 379-7350

5. Transporter 1 Company Name

Chem Freight

7. Transporter 2 Company Name

6. US EPA ID Number

OHD 075006304

8. US EPA ID Number

10. US EPA ID Number

9. Designated Facility Name and Site Address

Erieway, Inc.

33 Industry Drive

Bedford, OH 44146

OHD 055522429

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone 216-341-2500

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

216-439-1257

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers

No.

Type

13. Total  
Quantity14. Unit  
Wt/Vol

1. Waste No.

a. ☒ HM Hazardous Waste Liquid, N.O.S.  
ORM-E NA 9189 (EPCO # 0271)

2

DM

462 LBS.

P

4122  
D008

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

None 36426

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

D. C. MC MILLEN

Signature

*D.C. McMillen*

Month Day Year

8 13 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Fred Bostic

Signature

*Fred Bostic*

Month Day Year

8 13 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Virgil Williams

Signature

*Virgil Williams*

Month Day Year

8 13 87

ATTACHMENT 2  
(2) LOG SHEETS OF WEEKLY DRUM INSPECTION

TIME & DATE	GENERAL CONDITION	WARNING SIGNS	DRUM LABELS	FENCE	LOCK	STORAGE DRUMS	SIGNATURE
7/9/86 6:30 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
7/14/86 6:45 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
7/21/86 6:35 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
7/28/86 6:45 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
8/4/86 6:50 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
8/11/86 6:30 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
Three gallons of Dool added to Drum in Storage							D.C. McMullen
8/18/86 6:40 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
8/25/86 6:45 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
8/26/86 2:00 PM	Added 5gal F005, 4gal Dool, 2gal F002, 3gal — of F003 to Drum						D.C. McMullen
9/3/86 6:30 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
9/8/86 6:47 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
9/16/86 6:32 AM	OK	OK	OK	OK	OK	OK	R. Jerusalem
9/26/86 6:40 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
9/30/86 6:30 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
10/6/86 6:42 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
10/14/86 6:38 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
10/20/86 6:25 AM	OK	OK	OK	OK	OK	OK	D.C. McMullen
10/20/86	Added 5gal Dool to Drum in Storage						D.C. McMullen

# OPERATIONAL LOG

[illegible]

ATTACHMENT 3  
(1) LOG OF WASTES IN 5-GALLON CONTAINERS

# Amounts in waste drum

Non-Halogen

<u>Amt.</u>	<u>Class.</u>	<u>Date</u>
5 gal	F005	11-11-86
5 gal	D001	11-11-86
5 gal	F003	11-11-86
5 gal	D001	12-22-86
5 gal	F005	2-5-87
5 gal	F003	2-5-87
5 gal	D001	3-26-87
5 gal	F003	4-28-87
5 gal	F003	5-22-87
16 l (4 gal)	F003 (xylene)	5-22-87
→ DUMP #1		

5 gal	F005	7-10-87
5 gal	D001	7-10-87
5 gal	F003	7-10-87
5 gal	F005	9-30-87
5 gal	D001	9-30-87

Halogen

<u>Amt.</u>	<u>Date</u>
-------------	-------------



ATTACHMENT 4

(1) RCRA LAND RESTRICTION F-SOLVENT GENERATOR CHECKLIST

Inspector: Dennis DeNiro/M. Bates  
 Address: MHE 6480 Busch Blvd.  
Suite 120, Columbus, OH 43229  
 Telephone No: (614) 436-5550

DRAFT  
 RCRA LAND RESTRICTION F-SOLVENT  
 GENERATOR CHECKLIST

## I. HANDLER IDENTIFICATION

A. Handler Name Firestone Headquarters B. Street (or other identifier) 1200 Firestone Parkway

C. City Atsion D. State OHIO E. Zip Code 4 F. County Name Summit

G. Nature of Business; Identification of Operations  
World headquarters; Bldg. has a few satellite labs.

H. EPA ID # OHIO 001 288 109

I. Handler Contact (Name and Phone Number)  
David McMillen (216) 379-7350

## II. GENERATOR COMPLIANCE

## A. F-Solvent Identification

1. Does the handler generate the following wastes?

a. F001 ☐ Yes ☒ No  
 b. F002 ☐ Yes ☒ No  
 c. F003 ☒ Yes ☐ No

If an F003 wastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ☐ Yes ☐ No

d. F004 ☐ Yes ☒ No  
 e. F005 ☒ Yes ☐ No

2. Source of the above: Form 8700-12 ☐; Part A ☐; Part B ☐;  
 other (specify) ☒ interview w/ Dave McMillen; manifests.

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below: \_\_\_\_\_

Handler Name: Firestone WorldWyes  
 ID Number: OH0 001 288 109  
 Inspector: DeNiro/Bates  
 Date: 9/30/87

B. BDAT Treatability Group - Treatment Standards Identification

Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

☒ Yes ☐ No

*No wastewaters which contain solvents are generated at the facility.*

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

a. Knowledge of wastes ☒ Yes ☐ No

b. TCLP ☐ Yes ☒ No

c. Other (specify) \_\_\_\_\_

If knowledge, note how this is adequate:

*The lab maintains a sheet which details what goes into each 5 gallon can. The 5 gallon cans are emptied into the accumulation drum.*

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: \_\_\_\_\_

Note any problems: \_\_\_\_\_

- d. Were wastes tested using TCLP when a process or wastestream changed?

☐ Yes ☐ No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No  
☐ Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3]

☐ Yes ☒ No

D. Management

1. Onsite management

- a. Were F-solvent wastes managed onsite?

☒ Yes ☐ No

If yes, answer 1(b) and (c); if no, answer 2.

*Accumulated and stored on-site for less than 90 days*

## Comments

Yes ☐ No ☒

This is a small quantity generator. The drum is stored less than 90 days.

Yes      No

a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

(i) EPA waste number? ☒ Yes ☐ No

(ii) Applicable treatment standard? Yes ☒ No

(iii) Manifest number? ✓ Yes      No

(iv) Waste analysis data, if available? Yes *WIP* No

Identify offsite treatment facilities Criewarley, Bedford, OH

b. If F-solvent wastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]:

(i) EPA Hazardous waste number?      Yes      No

(ii) Applicable treatment standard? Yes No

(iii) Manifest number?        Yes        No

(iv) Waste analysis data, if available? Yes      No

(v) Certification that waste meets treatment standards? Yes      No     

Identify land disposal facilities receiving the BDAT certified wastes

Handler Name: Firestone World Adg. Co.  
 ID Number: ORD 001288109  
 Inspector: DeNiro/Bates  
 Date: 9/30/87

- c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]? *N/A*

Comments

Yes No

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG) [268.50(a)(1)]?

Yes ✓ No

If yes, was facility operating as a TSD under interim status or final permit? Yes No

If yes, TSD Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

Yes ✓ No

*No, treatment residuals generated.*

If yes, list type of treatment unit and processes

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

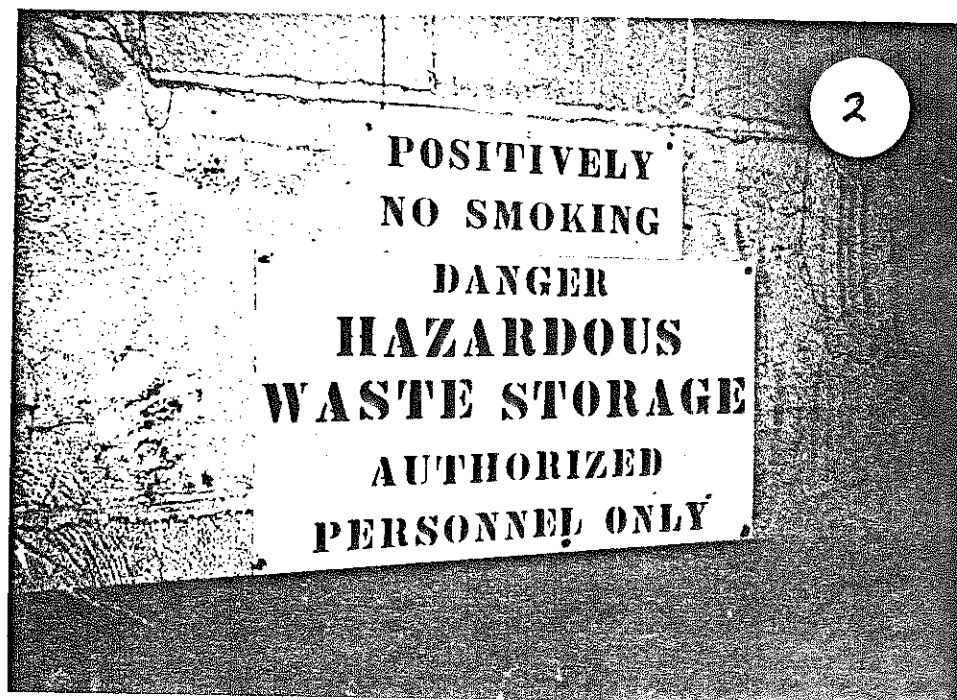
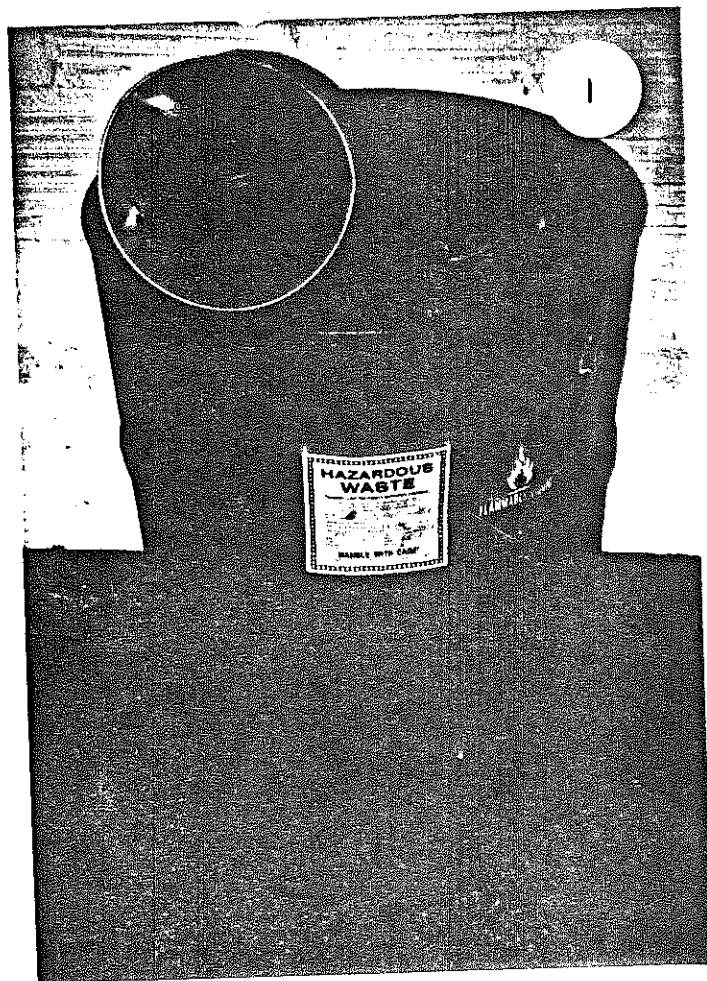
If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

ATTACHMENT 5  
(2) PHOTOGRAPHS

PHOTOGRAPH LIST

1. Drum in basement storage room of Firestone World Headquarters. 9/30/87
2. Hazardous waste sign outside storage room. 9/30/87





Re: DHMM  
Summit County  
Firestone Tire & Rubber Company  
#02-77-0325

G/T/TSD

Mr. George Markert, Environmental Consultant  
Environmental Engineering  
The Firestone Tire & Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44317

August 9, 1983

OHD 001 288109

Dear Mr. Markert:

On July 21, 1983, I conducted an inspection of the hazardous waste handling facility for the Firestone Tire & Rubber Company, World Headquarters. Your facility was represented by Robert Jereb, Hazardous Waste Coordinator. During the morning, various records were reviewed, the drum storage area was inspected, and waste management practices for the generating divisions of the World Headquarters were discussed.

As customary, a copy of the inspection report is enclosed for your information. This report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will also be forwarded to Mr. Jim Mayka of U.S. EPA - Region V.

The Agency at this time considers the World Headquarter's storage facility to be in general compliance with the applicable Ohio Hazardous Waste Rules OAC 3745-50 thru 3745-69 and Federal Hazardous Waste Regulations 40 CFR 260 - 265. Please review my comments under the Subpart B Remarks section. These items were discussed during our post-inspection meeting.

The efforts of Mr. Jereb, generating division personnel, and yourself are appreciated.

Sincerely,

Deborah J. Berg, R.S.  
District Inspector  
Division of Hazardous Materials Management

DJB:km

cc: ✓ Paula Cotter, DHMM, Central Office  
Ken Westlake, U.S. EPA - Region V  
Robert Jereb, Firestone Tire & Rubber Company



7-21-83 8:30 - 11:30 am.  
Date and time of inspection

RCRA INTERIM STATUS INSPECTION FORM

World Headquarters

HWFAB # 02-77-0325

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # 001288109

Facility: Firestone Tire & Rubber Company Address: 1200 Firestone Parkway City: Akron  
State: Ohio Zip Code: 44317 County: Summit Telephone: 216-379-6161

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Robert Jereb</u>	<u>Hazardous Waste Coordinator</u>	<u>216-379-7350</u>
2.			
3.			

INSPECTOR(S)

1.	<u>Deborah Berg</u>	<u>District Inspector</u>	<u>216-425-9171</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☒ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03                  |
| <input checked="" type="checkbox"/> Containers S01   | <input type="checkbox"/> Land Treatment D81               |
| <input type="checkbox"/> Tanks S02/T01   | <input type="checkbox"/> Landfills D80                    |
| <input type="checkbox"/> Surface Impoundments S04/T02  | <input type="checkbox"/> Chemical/Physical/Biological T04 |
| <input type="checkbox"/> Incineration/Thermal Treatment  | <input type="checkbox"/> Groundwater Monitoring           |
|  | <input type="checkbox"/> Post-Closure                     |

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>see previous</u> <u>HAZOP report</u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<u>    </u>	<u>✓</u>	<u>    </u>	<u>    </u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of <u>totally enclosed treatment</u> (Section 265.1(c)(9)) or via operation of an <u>elementary neutralization unit</u> and/or wastewater treatment unit (Section 265.1(c)(10)).	<u>✓</u>	<u>    </u>	<u>    </u>	<u>boiler plant</u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<u>    </u>	<u>    </u>	<u>✓</u>	<u>    </u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

## PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste.	✓	—	—	—
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Section 262.	✓	—	—	—
3. The transporter has signed the manifest as required by Section 263.20(b) and has carried the manifest with the waste shipment as required by 263.20(c).	✓	—	—	—
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has <del>signed the manifest</del> as required in Section 263.20(d) and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)). <i>obtained necessary signatures</i>	✓	—	—	—
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21).	✓	—	—	—
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f).	—	—	✓	—
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c)).	—	—	✓	—
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	—	✓	—	—
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)).	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards  
C: Preparedness and Prevention

D: Contingency and Emergency  
E: Manifest/Records/Reporting

G: Closure  
H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Remark #1</u>
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IF <u>BOTH</u> 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>          </u>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>          </u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>          </u>
c) Portable fire control equipment.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>          </u>
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>          </u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>by Fire Dept.</u>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>          </u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>          </u>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>          </u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>          </u>

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:
  - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1))
  - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
  - c) The estimated (or actual) weight, volume or density of the waste material(s).
  - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
  - e) The present physical location of each hazardous waste within the facility.
  - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2))
  - g) Records of any waste analyses and trial tests required to be performed.
  - h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).
  - i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).
  - j) Records of Closure cost estimates and ~~Post-Closure (DISPOSAL ONLY)~~ cost estimates required under Subpart G.

✓	—	—	—
✓	—	—	—
✓	—	—	—
✓	—	—	—
✓	—	—	—
—	—	✓	—
✓	—	—	—
✓	—	—	—
—	—	✓	—
✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. ( NOTE: Maximum inventory should agree with the permit.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A description of steps taken to decontaminate facility equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Remark #3</u>
e) The year closure is expected to begin and a schedule for the various phases of closure.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) A surety bond, or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) A closure letter of credit, or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) <del>A combination of financial mechanisms.</del> <i>Financial Vest</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>NOTE</u> : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.				
3. <i>Facility has established liability insurance for sudden release. (to be reviewed by CO-ORPA staff)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

## PART 5. TREATMENT/STORAGE/DISPOSAL

### SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

### Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	✓	—	—	—
b) In good physical condition (265.171)	✓	—	—	—
c) Compatible with the wastes stored in them (265.172)	✓	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	✓	—	—	—
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓	—	—	—
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓	—	—	—
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓	—	—	—
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	✓	—	—	—



Re: DHMM  
Summit County  
#02-77-0325

0140 001288109  
DD  
PFA

Mr. George Markert, Environmental Consultant  
Environmental Engineering  
The Firestone Tire & Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44317

January 4, 1983

Dear Mr. Markert:

The purpose of this letter is to summarize the events of our meeting of December 17, 1982, at the Firestone Tire & Rubber Company, Akron World Headquarters. Those participants of our discussions included: Mr. Joseph Laman, Mr. Tim Haldeman, Mr. Bob Jereb, Mr. Alvin King, Mr. Paul Craig, Mr. John Bachman, Mr. Dave McMillen, and yourself, of Firestone Tire & Rubber Company, and this writer and Mr. Rod Beals of Ohio EPA.

As previously noted, the Adhesives Group, the Compound Development Lab, and the Main Laboratory are your principle "satellite generators" of hazardous wastes within the World Headquarters complex. Having viewed the management practices currently being implemented in these areas, I am pleased to comment upon the efficient and regulatorily appropriate manner in which the wastes are being handled. Mr. Haldeman's, Mr. Bachman's, and Mr. McMillen's knowledge of the hazardous waste regulations was certainly evident.

Referencing my August 13, 1982, letter to you regarding necessary additions to the World Headquarter's Waste Analysis Plan, I am in receipt of documents acquired from you on September 13 and December 17, 1982. Having reviewed those documents, the Agency at this time considers the World Headquarter's storage facility to be in general compliance with the applicable Ohio Hazardous Waste Rules OAC 3745-50 thru 3745-58 and Federal Hazardous Waste Regulations 40 CFR 260-265.

Thank you for your cooperation and should any further questions arise, please feel free to call.

Sincerely,

Deborah J. Berg, R.S.  
Environmental Scientist  
Division of Hazardous Materials Management

DJB:km

cc: Bob Jereb, Firestone Tire & Rubber Company  
Kathy Homer, U.S. EPA - Region V  
Paula Cotter, DHMM, Central Office

*Follow up to  
previous inspection.  
Storage facility in  
compliance.*



Re: DHMM  
Summit County  
Permit #02-77-0325

Mr. George Markert, Environmental Consultant  
Environmental Engineering  
The Firestone Tire & Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44317

August 13, 1982

Dear Mr. Markert:

Thank you for the courtesies extended by you during my recent visits to the Firestone Tire & Rubber Company - Akron facilities. Inspections were conducted by myself at the Firestone Tire & Rubber Company (World Headquarters) on June 10, 1982, and August 10, 1982 (re-inspection). This facility was represented by Robert Jereb.

The purpose of these inspections were to ascertain compliance with State and Federal hazardous waste management rules. A copy of the inspection report is enclosed for your information. This inspection report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management, and will also be forwarded to Ms. Kathy Homer of U.S. EPA Region V.

I have delineated in the report the type of waste management program currently being implemented at this facility, and appreciate the amount of time and effort being expended in this regard by yourself and Mr. Jereb. The report indicates that the following violation still exists at this facility:

<u>Description of Violation</u>	<u>40 CFR</u>	<u>OAC</u>
Facility operator must develop a written waste analysis plan specifying sampling techniques, analytical methods, frequency of analyses, and parameters necessary to assure proper storage of waste.	265.13 (b)	3745-55-13 (B)

This plan is necessary to assure that any wastes, generated by the various divisions that cannot be characterized using existing material safety data sheets, can be properly analyzed prior to placement in the storage area, if appropriate. Although not required by the regulations, I might suggest that the waste analysis plan be expanded to include parameters necessary for disposal purposes, for those generated wastes differing from the F001-F005 and D001 classifications.

Please submit documentation for correction of the above noted violation to my attention, at the Northeast District Office of the Ohio EPA, within

Mr. George Markert  
Firestone Tire & Rubber Company  
August 13, 1982  
Page Two

thirty (30) days of receipt of this letter. Please contact me, at your earliest convenience, so that we can schedule a day to continue discussions with some of the division managers within the World Headquarters complex.

Should you have any questions, please feel free to call me, or Ms. Kathy Homer at (312) 886-7435.

Sincerely,

Deborah J. Berg, R.S.  
Environmental Scientist  
Division of Hazardous Materials Management

DJB:c11

Enclosure

cc: Ms. Kathy Homer, U.S. EPA, Region V  
Mr. Bob Fragale, Hazardous Waste Facility Approval Board, Central Office  
Ms. Paula Cotter, Div. of Hazardous Materials Management, Central Office  
Mr. Robert Jereb, Firestone Tire & Rubber Company





Re: Application Number 81-HW-0325  
Summit County

September 1, 1981

Charles T. Allen, Chief Chemist  
Firestone Tire & Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44312

Dear Mr. Allen:

On August 14, 1981, Deborah J. Berg of the Ohio EPA conducted an inspection of your facility as part of the Hazardous Waste Facility permit review process. Your facility was represented by Robert Jereb.

A copy of the inspection form is enclosed for your information. No unresolved deficiencies were noted, however, there may be comments included in the inspection form which you should consider.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan", is written over a horizontal line.

Paul Flanigan, P.E.  
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V  
Deborah J. Berg, NEDO

CERTIFIED MAIL

STATE IDENTIFICATION NUMBER

87-HH- 0325

EPA IDENTIFICATION NUMBER

OH0 001 288 109

TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: Firestone Tire & Rubber Company
- (B) Street: 1300 Firestone Parkway
- (C) City: Akron (D) State: Ohio (E) Zip Code: 44317
- (F) Phone: 216-379-7350 (G) County: Summit
- (H) Operator: same as above
- (I) Street: \_\_\_\_\_
- (J) City: \_\_\_\_\_ (K) State: \_\_\_\_\_ (L) Zip Code: \_\_\_\_\_
- (M) Phone: \_\_\_\_\_ (N) County: \_\_\_\_\_
- (O) Owner: same as above
- (P) Street: \_\_\_\_\_
- (Q) City: \_\_\_\_\_ (R) State: \_\_\_\_\_ (S) Zip Code: \_\_\_\_\_
- (T) Phone: \_\_\_\_\_ (U) County: \_\_\_\_\_
- (V) Date of Inspection: 8-14-81 (W) Time of Inspection (From) 8:30 (To) 10:30
- (X) Weather Conditions: SUNNY & clear low 70°F's.

Part A  
801 ISS  
Containers

III. GENERAL FACILITY STANDARDS:  
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	—	<u>N/A</u>
2. Facility expansion?	—	—	—	<u>N/A</u>
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	<u>bring completed <sup>now</sup> for questionable wastes from Plant Hardaway</u>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	<u>Safety sheets available. waste profile sheets on file</u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	✓	—	—	<u>using in-house hazardous waste control record</u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	<u>by Firestone Police</u>
2. Artificial or natural barrier around facility?	✓	—	—	<u>storage area fenced &amp; locked</u>
3. Controlled entry?	✓	—	—	
4. Danger sign(s) at entrance?	✓	—	—	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	—	—	<u>N/A</u>
2. Records of operator error?	—	—	—	<u>N/A</u>
3. Records of discharges?	—	—	—	<u>N/A</u>

\*Not Inspected

IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

Yes No NI\* Remarks

\_\_\_ ☒ \_\_\_

(B) If required, does the facility  
have the following equipment:

1. Internal communications or  
alarm systems?

☒ \_\_\_

*also  
storage area adjacent to  
Firestone Fire Department*

2. Telephone or 2-way radios  
at the scene of operations?

☒ \_\_\_

*phones & radios at Fire Department*

3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

☒ \_\_\_

*fire extinguishers  
foam unit on adjacent oil storage  
tank  
stockpiled sand to be used as  
absorbent*

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

☒ \_\_\_

*by Firestone Fire Department*

2. Is emergency equipment  
maintained in operable  
conditions?

☒ \_\_\_

(D) Has owner or operator provided  
immediate access to internal  
alarms? (if needed)

☒ \_\_\_

# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Firestone Fire &amp; Police</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>also on sign at storage facility</u>
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>since Nov 19, 1980</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>

\*Not Inspected

VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is closure estimate available by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>

VIII. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

I

USE AND MANAGEMENT OF CONTAINERS

Facility Name: Firestone Tire & Rubber Company Date of Inspection: 8-14-81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>concrete pad with diking</u> <u>drain pipe with plug</u>
5. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>inspected daily</u>
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K  
SURFACE IMPOUNDMENTS *N/A*

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? \_\_\_\_\_
2. Do earthen dikes have protective covers? \_\_\_\_\_
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? \_\_\_\_\_
4. Is the freeboard level inspected at least daily? \_\_\_\_\_
5. Are the dikes inspected weekly for evidence of leaks or deterioration? \_\_\_\_\_
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) \_\_\_\_\_
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) \_\_\_\_\_



LAND TREATMENT

N/A

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Is treated hazardous waste capable of biological or chemical degradation?  
\_\_\_\_\_
2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?  
\_\_\_\_\_
3. Is waste analyzed according to 265.273?  
\_\_\_\_\_
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?  
\_\_\_\_\_
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?  
\_\_\_\_\_
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?  
\_\_\_\_\_
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?  
\_\_\_\_\_
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)  
\_\_\_\_\_
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)  
\_\_\_\_\_

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.				
2) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?				
If not, the provisions of 40 CFR 265.17(b) apply.				
3) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?				
2. Does the landfill have a chemically and physically resistant liner system?				
3. Does the landfill have a functional leachate collection system?				
4. Are free liquids stabilized prior to or immediately after placement in the landfill?				
4) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?				

Yes No NI\* Remark

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

3. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

### III. Monitoring and Inspections

Yes No NI\* Remarks

4. Are combustion/emission control instruments monitored at least every 15 minutes? \_\_\_\_\_
5. Is steady state maintained or corrections attempted? \_\_\_\_\_
6. Is stack plume observed at least hourly for normal color and opacity? \_\_\_\_\_
7. Did any stack observations made by owner or operator show a plume different than normal?\*\* \_\_\_\_\_
8. If yes to D above, were corrections made to return emissions to normal appearance?\*\* \_\_\_\_\_
9. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions? \_\_\_\_\_
10. Are emergency shutdown controls and system alarms checked daily for proper operation? \_\_\_\_\_

\*Not Inspected

\*\*Specify in Remarks for what period of time this was checked.

	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Complete this section if the owner or operator of a TSD facility also ~~generates~~ hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### ~~MANIFEST REQUIREMENTS~~

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	_____	_____	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	_____	_____	_____

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation *N/A*

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

~~TRANSPORTER REQUIREMENTS~~  
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING  
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>SMU Nov 19, 1980</u>

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
B. Are signed completed manifest(s) on file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

\*Not Inspected

MS. DEBORAH BERG  
OHIO EPA  
TWINSBURG, OHIO

August 14, 1981

US Environmental Protection Agency  
Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Attention: Mr. Charles Grigalauski

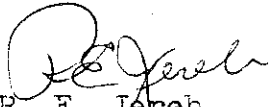
Gentlemen:

In reference to our Firestone Tire & Rubber Company manifest #A-3, I find that we did not receive a properly signed manifest from our TSD facility, namely Chemical Waste Management, Emelle, Alabama, within the 45-day limit.

On August 12, 1981, I contacted Chemical Waste Management by phone and was advised that the shipment never reached Chemical Waste Management in Alabama. I promptly called our transporter, Chem-Freight, Inc. in Bedford, Ohio, and was advised that the material in question was in fact at the Chem-Freight facility awaiting shipment to Alabama.

Attached please find a copy of our manifest #A-3 along with a letter of explanation from Chem-Freight, Inc.

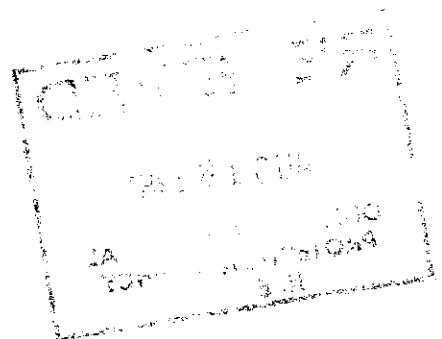
Very truly yours,

  
R. E. Jereb  
Coordinator, Hazardous Waste  
Traffic, Akron Operations  
The Firestone Tire & Rubber Company

REJ:pgm

Attachments

cc: Ms. Deborah Berg  
Ohio EPA  
2110 East Aurora Road  
Twinsburg, Ohio 44087, w/att.





# CHEM-FREIGHT INC.

P. U. C. O. 11239 - I

KRICK ROAD INDUSTRIAL PARKWAY

33 INDUSTRY DRIVE • BEDFORD, OHIO 44146 • (216) 439-2955

August 14, 1981

Firestone Tire & Rubber Co.  
Attn: Bob Gerab  
1200 Firestone Pkwy.  
Akron, Ohio 44317

Mr. Bob Gerab;

In reference to your Manifest No. A-3 and Alabama Manifest No. 019136 for shipment of 28 drums for disposal at Chemical Waste Management in Emelle, Alabama.

Please be advised that these drums are loaded for shipment aboard the trailer that will transport them to Alabama. In an effort to lower the shipping costs to our customers we try to consolidate small shipments into full trailer loads. This has been the case with your shipment and is the reason for the delay in the shipment.

Sincerely;



Albert W. Orr  
Terminal Mgr.  
Chem-Freight Inc.

AO/nmf

*Industrial Waste Transport*

## HAZARDOUS WASTE MANIFEST

A3

MANIFEST DOCUMENT NUMBER

CHEM FREIGHT

SHIPPER NUMBER

NAME OF CARRIER

(SCAC)

CARRIER NUMBER

## IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	000-001288109	PTB (FIRESTONE TIRE & RUBBER) CO., 1200 FSTNE. PKWY. AIRCRAFT, OH 44317 (216) 379-6836	6/24/81
TRANSPORTER #1	000-075006304	CHEM FREIGHT, 33 INDUSTRY DRIVE BEDFORD, OH (216) 439-2955	
TRANSPORTER #2 (if required)			
TSDF TREATMENT STORAGE OR DIS- POSAL FACILITY	ALT-000622464	CHEMICAL WASTE MANAGEMENT, P.O. BOX 55, EMERLE, AL 35459 1-205-652-9531	
TSDF TREATMENT STORAGE OR DIS- POSAL FACILITY			

## WASTE INFORMATION

Q. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
24	X	0001	SOLVENT, N.O.S. (FLAMMABLE)	HA1993	—	<23°	GAL	1200		
4	X	0001	CEMENT, RUBBER (FLAMMABLE)	HA1133	—	<23°	GAL	200		

## SPECIAL HANDLING INSTRUCTIONS

If an RC commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

## COMMENTS

For "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in item 430, Sec. 1.

## PLACARDS TENDERED

Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS	<b>COD</b> Amount \$	C.O.D. FEE: PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/> \$
<small>None—where the rate is dependent on value, shipper is required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$</small>	<small>If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "Carrier's or shipper's weight." Signature</small>	<small>Subject to Section 7 of the conditions of this shipment is to be delivered to the consignee without recourse on the bill of lading. The consignee shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. Signature of Consignee</small>
<small>RECEIVED: Subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.</small>		<b>TOTAL CHARGES:</b> \$ <b>FREIGHT CHARGES</b> <small>FREIGHT PREPAID (except when billed as collect) Check box if charges are to be collected</small>

## CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE &amp; DATE

TRANSPORTER #2 SIGNATURE &amp; DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

GENERATOR'S SIGNATURE

DATE

TSDF SIGNATURE

DATE

4

TO MEMORANDUM

Firestone   
INTEROFFICE

FROM R. E. JEREB

DATE AUGUST 14, 1981

REFERENCE

SUBJECT HAZARDOUS WASTE MANAGEMENT  
CONTINGENCY PLANS AND EMERGENCY PROCEDURES

To safely control disposal of hazardous wastes, all regulated materials will be stored outside the Plant One building in a temporary storage area. While Akron Plant One has received interim status approval as a TSD facility (approval to store hazardous wastes longer than ninety (90) days) it is our intent to use a contracted hazardous waste disposer to remove regulated materials prior to 90-day storage.

The following plan is issued to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste to the air, soil, or surface water environment. The plan includes contingency and emergency procedures to control an unplanned release of hazardous wastes.

PREPARATION AND PREVENTION

1. Both the Coordinator, Hazardous Waste and the Fire Departments must be advised of all new hazardous waste materials to be stored in the "hazardous waste storage area".
2. An on-site hazardous waste control record (Form 049-00449) must be prepared which identifies the hazardous waste, the quantity, type container, U.S. EPA hazardous waste number, DOT hazardous class, EPA description, and generator source. A copy of this record will be maintained on file in both the Storage Facility and Fire Departments.
3. Entrance to the "hazardous waste storage area" must be approved and supervised by the Coordinator or Fire Departments.
4. A daily inspection of the hazardous waste storage area will be made by the Fire Department to inspect possible leakage, drum damage, or other safety or environmental problems. A daily log will be maintained of this inspection in the Fire Department.
5. Fire control equipment will be tested and inspected monthly. The inspection will be entered on the daily log sheet in the Fire Department.

## EMERGENCY PROCEDURES

1. Fire, explosion or leakage of hazardous waste materials to the environment must be immediately reported to the Fire Department first, and then to the Coordinator and Manager, Traffic Department as soon as possible. The following emergency numbers should be used for communication:

Fire Department - 6408

Coordinator, Hazardous Waste - 7350

Manager, Traffic, Akron Operations - 6161  
4444

Emergencies after normal working hours should be reported to the Manager, Traffic, Akron Operations - D. K. Robinson - 864-9718 and the Coordinator, Hazardous Waste - R. E. Jereb - 745-2593.

2. The Fire Department will respond to the emergency situation (fire, explosion or leakage of hazardous waste material) using trained personnel and procedures accepted by the State of Ohio. The on-site hazardous waste control record will provide vital information to the Fire Department to determine the equipment or procedures necessary to control the emergency.
3. In a situation of extreme emergency where the life or health of the occupants of an office or production building is endangered, the Fire Department will notify Plant Protection to begin evacuation of the affected areas using the Firestone Fire and Evacuation Program.
4. The following emergency equipment to control fire, explosions or unplanned release of hazardous waste to the environment, based on knowledge of the waste expected to be generated and stored in the "hazardous waste storage area", are provided: rubber boots, rubber gloves, rubber aprons, face respirators, and chemical fire extinguishers.
5. The Firestone Medical Department has been provided with a list of all EP toxic, accutely toxic and hazardous-to-health materials, which could be potentially stored in hazardous waste storage areas, to be used to treat illnesses or emergency situations brought about by any fire, explosion or unplanned release of hazardous waste materials to the environment. This list will routinely be reviewed and maintained.

R. E. JEREB  
COORDINATOR, HAZARDOUS WASTE  
TRAFFIC, AKRON OPERATIONS  
REJ:pgm

412 E. OTHER PERMITS

MIT NUMBER	MISSION SOURCE	POLLUTANT	EXPIRATION DATE
677010129 PD 53	BUFFER NO 4, BUFFER GRINDER, SMALL CUT OUT	RUBBER DUST	REGISTRATION
PD 56	BUFFER, GRINDER, PAINTER WHITE SIDEWALL	RUBBER DUST PAINT FUMES	"
PD 58	HVY DUTY BUFFING - BALANCE PATCH	RUBBER DUST	"
PD 63	AIRBAG GRINDING	RUBBER DUST	"
PD 64	DOPE MIXING & BEAD CEMENTING		10-21-83
PD 65	BANBURY RUBBER MIXING 72, 73, 74	CARBON BLACK	REGISTRATION
PD 70	BANBURY 161	CARBON BLACK	REGISTRATION
PD 71	PELLET HANDLING & STORAGE	SOAPSTONE POWDER	10-21-83
PD 72			
PD 73			
PD 74	CARBON BLACK SYSTEM	CARBON BLACK	10-21-83
PD 75	FLAP PRESSES	1	REGISTRATION
PD 77	CURING OVEN	.	REGISTRATION
PD 78	NO 73 STOCK MIXING UNIT		REGISTRATION
PD 79	STEEL CORD CALENDER		REGISTRATION
PD 81	TIRE GRINDER	RUBBER DUST	REGISTRATION
PD 84	BLEMISH PAINT MACHINE		4-10-83
PD 88	161 BANBURY PIGMENT WEIGHING	PIGMENT DUST	

# RCRA Inspection Report

EPA Identification Number OHD 001288109

HWFAS Permit Number (if appropriate) 02-77-0325

Facility Name Firestone Tire & Rubber Company

Location 1200 Firestone Parkway  
Akron, Ohio 44317

Person(s) Interviewed	Title	Telephone
<u>Robert Jereb</u>	<u>Hazardous Waste Coordinator</u>	<u>216-399-7350</u>

Inspector(s)	Agency/Title	Telephone
<u>Deborah J. Berg</u>	Ohio EPA <u>EPA Scientist</u>	<u>216-425-9171</u>
	Ohio EPA	
	Ohio EPA	

## Installation Activity

Mark One

- ☐ Generator only (G)
- ☐ Transporter only (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☒ G-T-TSDF

- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80

If the site is a TSDF, check the boxes indicating which forms were used -

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting
- ☐ Groundwater Monitoring
- ☒ Closure and Post-Closure
- ☒ Financial Requirements
- ☒ Containers S01
- ☐ Tanks S02/T01
- ☒ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment T03
- ☐ Chemical/Physical/Biological T04

7-21-82 8:30 - 11:30 AM.  
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

World Headquarters

HWFAB # 02-77-0325

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # 001288109

Facility: Firestone Tire & Rubber Company Address: 1200 Firestone Parkway City: Akron  
State: Ohio Zip Code: 44317 County: Summit Telephone: 216-379-6161

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Robert Jereb</u>	<u>Hazardous Waste Coordinator</u>	<u>216-379-2350</u>
2.			
3.			

INSPECTOR(S)

1.	<u>Deborah Berg</u>	<u>District Inspector</u>	<u>216-425-9171</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☒ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03                  |
| <input checked="" type="checkbox"/> Containers S01   | <input type="checkbox"/> Land Treatment D81               |
| <input type="checkbox"/> Tanks S02/T01   | <input type="checkbox"/> Landfills D80                    |
| <input type="checkbox"/> Surface Impoundments S04/T02  | <input type="checkbox"/> Chemical/Physical/Biological T04 |
| <input type="checkbox"/> Incineration/Thermal Treatment  | <input type="checkbox"/> Groundwater Monitoring           |
|  | <input type="checkbox"/> Post-Closure                     |

Revised 9/15/82



RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
1. Has the facility submitted a Part A to Ohio?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
2. If "yes", is it complete and accurate?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
3. Has the facility submitted a Part B?	<u>—</u>	<u>✓</u>	<u>✓</u>	<u>—</u>

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

*Storage in drums of F001, F002, F003, F004, F005, & D001 wastes. All other wastes generated by other divisions (satellite generators/ small quantity generators) are shipped off-site within 90 days of generation (predominantly lab-packed wastes).*

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>see previous HSP report</i>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an <u>elementary neutralization unit</u> and/or wastewater treatment unit (Section 265.1(c)(10)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>boiler plant</i>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	<u>✓</u>	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b).	<u>✓</u>	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	<u>✓</u>	—	—	<i>supplied &amp; TSD</i>
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.	—	—	<u>✓</u>	—
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<u>✓</u>	—	—	—
b) The date that accumulation began is clearly marked on each container.	<u>✓</u>	—	—	—
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	<u>✓</u>	—	—	—
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	<u>✓</u>	—	—	<i>satellite generated training to be document.</i>

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS



# RCRA INTERIM STATUS INSPECTION FORM

## PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste.	✓	—	—	—
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Section 262.	✓	—	—	—
3. The transporter has signed the manifest as required by Section 263.20(b) and has carried the manifest with the waste shipment as required by 263.20(c).	✓	—	—	—
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has <del>signed the manifest</del> as required in Section 263.20(d) and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)). <i>obtained necessary signatures</i>	✓	—	—	—
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21).	✓	—	—	—
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f).	—	—	✓	—
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c)).	—	—	✓	—
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	—	✓	—	—
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)).	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remarks</u>
b) Were all of the notifications required by Section 263.30(c)(d) made?	—	—	✓	—
c) Was the discharge cleaned up as required by Section 263.31?	—	—	✓	—
9. Does the transporter store hazardous waste temporarily while they are in transit?	—	✓	—	—
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage (263.12).	—	—	✓	—

NOTE : TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	—	✓	—	—
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	—	✓	—	—

NOTE : A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

*(Transporter for wastes from Firstene Central Research & Firstene Research Pilot Plant [TSO]).*



# RCRA INTERIM STATUS INSPECTION FORM

## PART 4. GENERAL INTERIM STATUS REQUIREMENTS

### SUBPARTS INCLUDED

B: General Facility Standards  
C: Preparedness and Prevention

D: Contingency and Emergency  
E: Manifest/Records/Reporting

G: Closure  
H: Financial Requirements

### Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Remark #1</u>
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remarks</u>
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	daily 40 ft. well by Cool
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Remarks
9. If required due to the actual hazards associated with <u>Ignitable</u> , Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	only compat. solvents are comingling

# RCRA INTERIM STATUS INSPECTION FORM

## Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	—	✓	—	—
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	✓	—	—	—
b) Access to telephone, radio or other device for summoning emergency assistance.	✓	—	—	—
c) Portable fire control equipment.	✓	—	—	—
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓	—	—	—
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	✓	—	—	by Fire Dept.
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	✓	—	—	—
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	✓	—	—	—
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))	✓	—	—	—
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

Yes    No    N/A    Remark

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:

a) Actions to be taken by personnel in the event of an emergency incident.

✓                        

b) Arrangements or agreements with local or state emergency authorities.

✓                        

c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.

✓                        

d) A list of all emergency equipment including location, physical description and outline of capabilities.

✓                        

e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))

✓                        

2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)

✓                        

3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)

✓                        

4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)

✓                        

5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.

                ✓

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:
  - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1))
 

	✓	—	—	
--	---	---	---	--
  - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
 

	✓	—	—	
--	---	---	---	--
  - c) The estimated (or actual) weight, volume or density of the waste material(s).
 

	✓	—	—	
--	---	---	---	--
  - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
 

	✓	—	—	
--	---	---	---	--
  - e) The present physical location of each hazardous waste within the facility.
 

	✓	—	—	
--	---	---	---	--
  - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2))
 

	—	—	✓	
--	---	---	---	--
  - g) Records of any waste analyses and trial tests required to be performed.
 

	✓	—	—	
--	---	---	---	--
  - h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).
 

	✓	—	—	
--	---	---	---	--
  - i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).
 

	—	—	✓	
--	---	---	---	--
  - j) Records of Closure cost estimates and ~~Post-Closure (DISPOSAL ONLY)~~ cost estimates required under Subpart G.
 

	✓	—	—	
--	---	---	---	--

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remar</u>
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.	<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)	<u>  </u>	<u>  </u>	<u>✓</u>	<u>  </u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))	<u>  </u>	<u>  </u>	<u>✓</u>	<u>  </u>
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))	<u>  </u>	<u>  </u>	<u>✓</u>	<u>  </u>
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director.	<u>  </u>	<u>  </u>	<u>✓</u>	<u>  </u>
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.	<u>  </u>	<u>  </u>	<u>✓</u>	<u>  </u>

## Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)	<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
a) A description of how and when the facility will be closed. (265.112(a)(1)).	<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. ( NOTE: Maximum inventory should agree with the permit.)	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
d) A description of steps taken to decontaminate facility equipment.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>Remark #3</u>
e) The year closure is expected to begin and a schedule for the various phases of closure.	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u>    </u>	<u>    </u>	<u>✓</u>	<u>    </u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<u>    </u>	<u>    </u>	<u>✓</u>	<u>    </u>

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
b) A surety bond, or	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
c) A closure letter of credit, or	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
d) <del>A combination of financial mechanisms.</del> <i>Financial Vest</i>	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>NOTE</u> : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.				
3. <i>Facility has established liability insurance for sudden release. (to be reviewed by CO-OEPA staff)</i>	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>



RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

✓ — — —  
revised to \$8,500

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

Remark #1 Although not required by regulation, facility operator should consider expansion of the waste analysis plan to include a listing of all wastes generated at Firestone World Headquarters (not just the 2001, Four-F005 solvents) and the selected analytical parameters (and rationale) for each. This recommended expansion would ~~ensure~~ assure Firestone of proper disposal of all wastes in the event of unanticipated facility personnel changes.

Remark #2 As noted in the previous inspection report, "satellite generator" personnel are a vital part of your waste management program & are a part of your personnel training system. I am noting that the documented annual review of these personnel is currently underway.

Remark #3 As we discussed, several options exist for the demonstration of effective decontamination. Please advise if you have further questions.

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	✓	—	—	_____
b) In good physical condition (265.171)	✓	—	—	_____
c) Compatible with the wastes stored in them (265.172)	✓	—	—	_____
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	✓	—	—	_____
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓	—	—	_____
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓	—	—	_____
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓	—	—	_____
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	✓	—	—	_____



Re: DHMM  
Summit County  
#02-77-0325

0140 001288109  
DD  
PFA

Mr. George Markert, Environmental Consultant  
Environmental Engineering  
The Firestone Tire & Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44317

January 4, 1983

Dear Mr. Markert:

The purpose of this letter is to summarize the events of our meeting of December 17, 1982, at the Firestone Tire & Rubber Company, Akron World Headquarters. Those participants of our discussions included: Mr. Joseph Laman, Mr. Tim Haldeman, Mr. Bob Jereb, Mr. Alvin King, Mr. Paul Craig, Mr. John Bachman, Mr. Dave McMillen, and yourself, of Firestone Tire & Rubber Company, and this writer and Mr. Rod Beals of Ohio EPA.

As previously noted, the Adhesives Group, the Compound Development Lab, and the Main Laboratory are your principle "satellite generators" of hazardous wastes within the World Headquarters complex. Having viewed the management practices currently being implemented in these areas, I am pleased to comment upon the efficient and regulatorily appropriate manner in which the wastes are being handled. Mr. Haldeman's, Mr. Bachman's, and Mr. McMillen's knowledge of the hazardous waste regulations was certainly evident.

Referencing my August 13, 1982, letter to you regarding necessary additions to the World Headquarter's Waste Analysis Plan, I am in receipt of documents acquired from you on September 13 and December 17, 1982. Having reviewed those documents, the Agency at this time considers the World Headquarter's storage facility to be in general compliance with the applicable Ohio Hazardous Waste Rules OAC 3745-50 thru 3745-58 and Federal Hazardous Waste Regulations 40 CFR 260-265.

Thank you for your cooperation and should any further questions arise, please feel free to call.

Sincerely,

Deborah J. Berg, R.S.  
Environmental Scientist  
Division of Hazardous Materials Management

DJB:km

cc: Bob Jereb, Firestone Tire & Rubber Company  
Kathy Homer, U.S. EPA - Region V  
Paula Cotter, DHMM, Central Office

Follow up to  
previous inspection.  
Storage facility in  
compliance.



Re: DHMM  
Summit County  
Permit #02-77-0325

Mr. George Markert, Environmental Consultant  
Environmental Engineering  
The Firestone Tire & Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44317

August 13, 1982

Dear Mr. Markert:

Thank you for the courtesies extended by you during my recent visits to the Firestone Tire & Rubber Company - Akron facilities. Inspections were conducted by myself at the Firestone Tire & Rubber Company (World Headquarters) on June 10, 1982, and August 10, 1982 (re-inspection). This facility was represented by Robert Jereb.

The purpose of these inspections were to ascertain compliance with State and Federal hazardous waste management rules. A copy of the inspection report is enclosed for your information. This inspection report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management, and will also be forwarded to Ms. Kathy Homer of U.S. EPA Region V.

I have delineated in the report the type of waste management program currently being implemented at this facility, and appreciate the amount of time and effort being expended in this regard by yourself and Mr. Jereb. The report indicates that the following violation still exists at this facility:

<u>Description of Violation</u>	<u>40 CFR</u>	<u>OAC</u>
Facility operator must develop a written waste analysis plan specifying sampling techniques, analytical methods, frequency of analyses, and parameters necessary to assure proper storage of waste.	265.13 (b)	3745-55-13 (B)

This plan is necessary to assure that any wastes, generated by the various divisions that cannot be characterized using existing material safety data sheets, can be properly analyzed prior to placement in the storage area, if appropriate. Although not required by the regulations, I might suggest that the waste analysis plan be expanded to include parameters necessary for disposal purposes, for those generated wastes differing from the F001-F005 and D001 classifications.

Please submit documentation for correction of the above noted violation to my attention, at the Northeast District Office of the Ohio EPA, within

Mr. George Markert  
Firestone Tire & Rubber Company  
August 13, 1982  
Page Two

thirty (30) days of receipt of this letter. Please contact me, at your earliest convenience, so that we can schedule a day to continue discussions with some of the division managers within the World Headquarters complex.

Should you have any questions, please feel free to call me, or Ms. Kathy Homer at (312) 886-7435.

Sincerely,

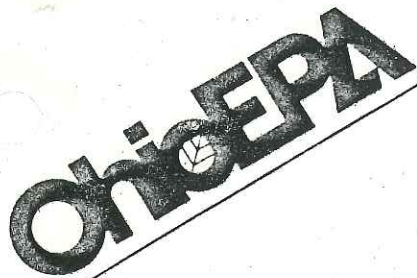
Deborah J. Berg, R.S.  
Environmental Scientist  
Division of Hazardous Materials Management

DJB:c11

Enclosure

cc: Ms. Kathy Homer, U.S. EPA, Region V  
Mr. Bob Fragale, Hazardous Waste Facility Approval Board, Central Office  
Ms. Paula Cotter, Div. of Hazardous Materials Management, Central Office  
Mr. Robert Jereb, Firestone Tire & Rubber Company





Re: Application Number 81-HW-0325  
Summit County

September 1, 1981

Charles T. Allen, Chief Chemist  
Firestone Tire & Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44312

Dear Mr. Allen:

On August 14, 1981, Deborah J. Berg of the Ohio EPA conducted an inspection of your facility as part of the Hazardous Waste Facility permit review process. Your facility was represented by Robert Jereb.

A copy of the inspection form is enclosed for your information. No unresolved deficiencies were noted, however, there may be comments included in the inspection form which you should consider.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan".

Paul Flanigan, P.E.  
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V  
Deborah J. Berg, NEDO

CERTIFIED MAIL

STATE IDENTIFICATION NUMBER

87-HM- 0325

EPA IDENTIFICATION NUMBER

OH0 001 288 109

TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: Firestone Tire & Rubber Company  
(B) Street: 1200 Firestone Parkway  
(C) City: Akron (D) State: Ohio (E) Zip Code: 44317  
(F) Phone: 216-379-7350 (G) County: Summit  
(H) Operator: same as above  
(I) Street: \_\_\_\_\_  
(J) City: \_\_\_\_\_ (K) State: \_\_\_\_\_ (L) Zip Code: \_\_\_\_\_  
(M) Phone: \_\_\_\_\_ (N) County: \_\_\_\_\_  
(O) Owner: same as above  
(P) Street: \_\_\_\_\_  
(Q) City: \_\_\_\_\_ (R) State: \_\_\_\_\_ (S) Zip Code: \_\_\_\_\_  
(T) Phone: \_\_\_\_\_ (U) County: \_\_\_\_\_  
(V) Date of Inspection: 8-14-81 (W) Time of Inspection (From) 8:30 (To) 10:30  
(X) Weather Conditions: Sunny & clear low 70°F's.

Part A  
801

ISS  
Containers



(Y)	Person(s) Interviewed	Title	Telephone
	<u>Robert Tereb</u>	<u>Coordinator, Hazardous Waste</u>	<u>379-7350</u>
	_____	_____	_____
	_____	_____	_____
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>same as above</u>	_____	_____
	_____	_____	_____
	_____	_____	_____
(AA)	Preparer Information		
	Name	Agency/Title	Telephone
	<u>Deborah Berg</u>	<u>Ohio EPA - Env. Sci.</u>	<u>216-425-9171</u>

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> A. <del>Storage and/or Treatment</del><br>1. <del>Containers (I)</del><br>2. Tanks (J)<br>3. Surface Impoundments (K)<br>4. Waste Piles (L)<br><br>___ B. Land Treatment (M)<br><br>___ C. Landfills (N) | ___ D. Incineration and/or Thermal Treatment (O and P)<br><br>___ E. Chemical, Physical, and Biological Treatment (Q) |
|--|---|

Note: If facility is also a ~~generator~~ or ~~transporter~~ of hazardous waste complete sections ~~IX and X~~ of this form as appropriate.

III. GENERAL FACILITY STANDARDS:  
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	—	<u>N/A</u>
2. Facility expansion?	—	—	—	<u>N/A</u>
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>✓</u>	—	—	<u>bring completed <sup>now</sup> for questionnaire</u>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>✓</u>	—	—	<u>Wastes from Plant Hardway Safety sheets available waste profile sheets on file</u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>✓</u>	—	—	<u>using in-house hazardous waste control record</u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>✓</u>	—	—	<u>by Firestone Police</u>
2. Artificial or natural barrier around facility?	<u>✓</u>	—	—	<u>storage area fenced &amp; locked</u>
3. Controlled entry?	<u>✓</u>	—	—	
4. Danger sign(s) at entrance?	<u>✓</u>	—	—	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	—	—	<u>N/A</u>
2. Records of operator error?	—	—	—	<u>N/A</u>
3. Records of discharges?	—	—	—	<u>N/A</u>

\*Not Inspected

### III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	✓	---	---	by Firestone Fire
5. Safety, emergency equipment?	✓	---	---	
6. Security devices?	✓	---	---	
7. Operating and structural devices?	✓	---	---	concrete pad / dike
8. Inspection log?	✓	---	---	by Firestone Fire
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓	---	---	
2. Job descriptions?	✓	---	---	
3. Description of training?	✓	---	---	
4. Records of training?	✓	---	---	Fire Dept. personnel / waste handlers
5. Have facility personnel received required training by 5-19-81?	✓	---	---	
6. Do new personnel receive required training within six months?	✓	---	---	7-28-81 waste handlers scheduled for training under direct supervision of regional supervisor at the present time
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	✓	---	---	incompatible wastes not commingled
2. No smoking signs?	✓	---	---	
3. Separation and protection from ignition sources?	✓	---	---	

\*Not Inspected.

IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

Yes No NI\* Remarks

\_\_\_ ✓ \_\_\_

(B) If required, does the facility  
have the following equipment:

1. Internal communications or  
alarm systems?

✓ \_\_\_ \_\_\_ *also  
Storage area adjacent to  
Firestone Fire Department*

2. Telephone or 2-way radios  
at the scene of operations?

✓ \_\_\_ \_\_\_ *phones & radios at Fire Department*

3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

✓ \_\_\_ \_\_\_ *fire extinguishers  
foam unit on adjacent oil storage  
tank  
stockpiled sand to be used as  
absorbant*

Indicate the volume of water and/or foam available for fire control:

\_\_\_\_\_  
\_\_\_\_\_

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

✓ \_\_\_ \_\_\_ *by Firestone Fire Department*

2. Is emergency equipment  
maintained in operable  
conditions?

✓ \_\_\_ \_\_\_

(D) Has owner or operator provided  
immediate access to internal  
alarms? (if needed)

✓ \_\_\_ \_\_\_

(E) Is there adequate aisle space  
for unobstructed movement?

✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the  
following information:

Yes No NI\* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)  
✓      \_\_\_\_\_      \_\_\_\_\_      Provisions attached
2. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?  
\_\_\_\_\_      \_\_\_\_\_      \_\_\_\_\_      Firestone Fire Department  
" Police  
" Medical Center  
State & local emergency  
response team
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?  
✓      \_\_\_\_\_      \_\_\_\_\_      \_\_\_\_\_
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?  
✓      \_\_\_\_\_      \_\_\_\_\_      \_\_\_\_\_
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)  
✓      \_\_\_\_\_      \_\_\_\_\_      \_\_\_\_\_

\*Not Inspected

# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Firestone Fire &amp; Police</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>also on sign at storage facility</u>
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Since Nov 19, 1980</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>

\*Not Inspected

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓

2. Does the operating record contain the following information:

\*\*b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓

c. The location and quantity of each hazardous waste within the facility?

✓

\*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

f. Reports detailing all incidents that required implementation of the Contingency Plan?

N/A

g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities



VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is closure estimate available by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A

VIII. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

I

USE AND MANAGEMENT OF CONTAINERS

Facility Name: Firestone Tire & Rubber Company Date of Inspection: 8-14-81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	concrete pad with diking drain pipe with plug
5. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	inspected daily
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>separate by distance</u>

J  
TANKS *N/A*

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	_____	_____	_____	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	_____	_____	_____	_____
3. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	_____	_____	_____	_____
5. Are required daily and weekly inspections done?	_____	_____	_____	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____

\*Not Inspected

Yes No NI\* Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K  
SURFACE IMPOUNDMENTS *N/A*

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

- |  |       |       |       |       |
|--|-------|-------|-------|-------|
| 1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?  | _____ | _____ | _____ | _____ |
| 2. Do earthen dikes have protective covers?  | _____ | _____ | _____ | _____ |
| 3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?  | _____ | _____ | _____ | _____ |
| 4. Is the freeboard level inspected at least daily?  | _____ | _____ | _____ | _____ |
| 5. Are the dikes inspected weekly for evidence of leaks or deterioration?  | _____ | _____ | _____ | _____ |
| 6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | _____ | _____ | _____ | _____ |
| 7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)   | _____ | _____ | _____ | _____ |

L  
WASTE PILES

N/A

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

\*Not Inspected

M

LAND TREATMENT

N/A

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Is treated hazardous waste capable of biological or chemical degradation?

-----

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

-----

3. Is waste analyzed according to 265.273?

-----

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

-----

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

-----

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

-----

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

-----

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

-----

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

-----

N  
LANDFILLS *N/A*

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
<b>(A) General Operating Requirements</b>				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	-----
**2. Collection of run-off from active portions of the fill?	---	---	---	-----
**3. Is collected run off treated?	---	---	---	-----
4. Control of wind dispersal of hazardous waste?	---	---	---	-----
(**Effective 11-19-81)				
<b>(B) Surveying and Recordkeeping</b>				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	-----
2. The contents of each cell and the location of each hazardous waste - type withing each cell?	---	---	---	-----
<b>(C) Closure and Post-Closure</b>				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	-----
2. Has this plan been submitted to the Regional Administrator?	---	---	---	-----
3. Has closure begun?	---	---	---	-----
4. Is closure cost estimate available by 5-19-81?	---	---	---	-----
<b>(D) Special requirements for ignitable or reactive waste</b>				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
	---	---	---	-----

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.				
Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?				
If not, the provisions of 40 CFR 265.17(b) apply.				
Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?				
2. Does the landfill have a chemically and physically resistant liner system?				
3. Does the landfill have a functional leachate collection system?				
4. Are free liquids stabilized prior to or immediately after placement in the landfill?				
Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?				



O and P  
INCINERATION and THERMAL TREATMENT *N/A*

(A) Facility Name: \_\_\_\_\_

(B) Date of Inspection: \_\_\_\_\_

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): \_\_\_\_\_

B. Components and steady state condition:

\*\*\*\* Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

\*Not Inspected

- |  | Yes   | No    | NI*   | Remarks |
|--|-------|-------|-------|---------|
| 2. Has documented or written data been substituted for analysis of either:   |       |       |       |         |
| a. Lead?   | _____ | _____ | _____ | _____   |
| b. Mercury?  | _____ | _____ | _____ | _____   |
| 3. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.) |       |       |       |         |

	Remarks
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

### III. Monitoring and Inspections

- |  | Yes   | No    | NI*   | Remarks |
|--|-------|-------|-------|---------|
| 1. Are combustion/emission control instruments monitored at least every 15 minutes?                          | _____ | _____ | _____ | _____   |
| 2. Is steady state maintained or corrections attempted?  | _____ | _____ | _____ | _____   |
| 3. Is stack plume observed at least hourly for normal color and opacity?                                     | _____ | _____ | _____ | _____   |
| 4. Did any stack observations made by owner or operator show a plume different than normal?*                 | _____ | _____ | _____ | _____   |
| 5. If yes to D above, were corrections made to return emissions to normal appearance?*                       | _____ | _____ | _____ | _____   |
| 6. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions? | _____ | _____ | _____ | _____   |
| 7. Are emergency shutdown controls and system alarms checked daily for proper operation?                     | _____ | _____ | _____ | _____   |

\*Not Inspected

\*Specify in Remarks for what period of time this was checked.

#### IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others		
0 to 100.....	204 m	670	ft
101 to 1,000.....	380 m	1,250	ft
1,001 to 10,000.....	530 m	1,730	ft
10,001 to 30,000.....	690 m	2,260	ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

*N/A*

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Complete this section if the owner or operator of a TSD facility also ~~generates~~ hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### ~~MANIFEST REQUIREMENTS~~

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	_____	_____	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	_____	_____	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>will send copy of report for 6-34-81 shipment</i>

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation *N/A*

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

~~VI. RECORDKEEPING and REPORTING~~  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>manifests</u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>exception report</u> <u>to be forwarded -</u> <u>now attached</u>

~~VII. INTERNATIONAL SHIPMENTS~~  
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?           ☒          

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:
  - a. Notified the Administrator in writing?
  - b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?
  - c. Met the Manifest requirements?
2. Importing Hazardous Waste, has the generator:
 

Met the manifest requirements?



~~TRANSPORTER REQUIREMENTS~~  
~~40 CFR Part 263~~

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING  
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>shall Nov 19, 1980</u>

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
B. Are signed completed manifest(s) on file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

\*Not Inspected

# REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

*Note: Please change facility contact to Robert Jereb  
at the same number.*

MS. DEBORAH BERG  
OHIO EPA  
TWINSBURG, OHIO

August 14, 1981

US Environmental Protection Agency  
Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Attention: Mr. Charles Grigalauski


Gentlemen:

In reference to our Firestone Tire & Rubber Company manifest #A-3, I find that we did not receive a properly signed manifest from our TSD facility, namely Chemical Waste Management, Emelle, Alabama, within the 45-day limit.

On August 12, 1981, I contacted Chemical Waste Management by phone and was advised that the shipment never reached Chemical Waste Management in Alabama. I promptly called our transporter, Chem-Freight, Inc. in Bedford, Ohio, and was advised that the material in question was in fact at the Chem-Freight facility awaiting shipment to Alabama.

Attached please find a copy of our manifest #A-3 along with a letter of explanation from Chem-Freight, Inc.

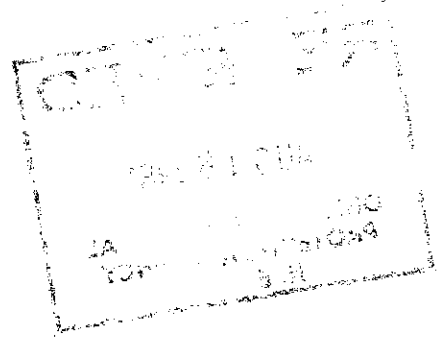
Very truly yours,

  
R. E. Jereb  
Coordinator, Hazardous Waste  
Traffic, Akron Operations  
The Firestone Tire & Rubber Company

REJ:pgm

Attachments

cc: Ms. Deborah Berg  
Ohio EPA  
2110 East Aurora Road  
Twinsburg, Ohio 44087, w/att.



# CHEM-FREIGHT INC.

P. U. C. O. 11239 - I

KRICK ROAD INDUSTRIAL PARKWAY

33 INDUSTRY DRIVE • BEDFORD, OHIO 44146 • (216) 439-2955

August 14, 1981

Firestone Tire & Rubber Co.  
Attn: Bob Gerab  
1200 Firestone Pkwy.  
Akron, Ohio 44317

Mr. Bob Gerab;

In reference to your Manifest No. A-3 and Alabama Manifest No. 019136 for shipment of 28 drums for disposal at Chemical Waste Management in Emelle, Alabama.

Please be advised that these drums are loaded for shipment aboard the trailer that will transport them to Alabama. In an effort to lower the shipping costs to our customers we try to consolidate small shipments into full trailer loads. This has been the case with your shipment and is the reason for the delay in the shipment.

Sincerely;



Albert W. Orr  
Terminal Mgr.  
Chem-Freight Inc.

AO/nmf

*Industrial Waste Transport*

## HAZARDOUS WASTE MANIFEST

A3

MANIFEST DOCUMENT NUMBER

CHEM FREIGHT

SHIPPER NUMBER

NAME OF CARRIER

(SCAC)

CARRIER NUMBER

## IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	OID-001288109	FTI (FIRESTONE TIRE & RUBBER) CO., 1280 FSTNE. HWY. AARON, OH 44317 (216) 379-6836	6/24/81
TRANSPORTER #1	OID-075006304	CHEM FREIGHT, 33 INDUSTRY DRIVE BEDFORD, OH (216) 439-2955	
TRANSPORTER #2 (if required)			
TSDF TREATMENT STORAGE OR DIS- POSAL FACILITY	ALT-000622464	CHEMICAL WASTE MANAGEMENT, P.O. BOX 55, EMERUS, AL 35459 1-205-652-9531	
TSDF TREATMENT STORAGE OR DIS- POSAL FACILITY			

## WASTE INFORMATION

Q. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
24	X	0001	SOLVENT, N.O.S. (FLAMMABLE)	HA1993	—	< 23°	GAL	1200		
4	X	0001	CEMENT, RUBBER (FLAMMABLE)	HA1133	—	< 23°	GAL	200		

## SPECIAL HANDLING INSTRUCTIONS

If an RC commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8902 (not free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec, 1-800-424-9300 immediately.

## COMMENTS

In "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

## PLACARDS TENDERED

Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS	<b>COD</b> Amt: \$	C.O.D. FEE: PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/> \$
<small>Note: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____.</small>	<small>If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."</small>	TOTAL CHARGES: \$
Signature _____		FREIGHT PREPAID <input type="checkbox"/> Check box if charges are to be prepaid by shipper.

RECEIVED: Subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or

any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

## CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

GENERATOR'S SIGNATURE

DATE

TSDF SIGNATURE

DATE

4

TO MEMORANDUM



FROM R. E. JEREB

DATE AUGUST 14, 1981

REFERENCE

SUBJECT HAZARDOUS WASTE MANAGEMENT  
CONTINGENCY PLANS AND EMERGENCY PROCEDURES

To safely control disposal of hazardous wastes, all regulated materials will be stored outside the Plant One building in a temporary storage area. While Akron Plant One has received interim status approval as a TSD facility (approval to store hazardous wastes longer than ninety (90) days) it is our intent to use a contracted hazardous waste disposer to remove regulated materials prior to 90-day storage.

The following plan is issued to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste to the air, soil, or surface water environment. The plan includes contingency and emergency procedures to control an unplanned release of hazardous wastes.

#### PREPARATION AND PREVENTION

1. Both the Coordinator, Hazardous Waste and the Fire Departments must be advised of all new hazardous waste materials to be stored in the "hazardous waste storage area".
2. An on-site hazardous waste control record (Form 049-00449) must be prepared which identifies the hazardous waste, the quantity, type container, U.S. EPA hazardous waste number, DOT hazardous class, EPA description, and generator source. A copy of this record will be maintained on file in both the Storage Facility and Fire Departments.
3. Entrance to the "hazardous waste storage area" must be approved and supervised by the Coordinator or Fire Departments.
4. A daily inspection of the hazardous waste storage area will be made by the Fire Department to inspect possible leakage, drum damage, or other safety or environmental problems. A daily log will be maintained of this inspection in the Fire Department.
5. Fire control equipment will be tested and inspected monthly. The inspection will be entered on the daily log sheet in the Fire Department.

## EMERGENCY PROCEDURES

1. Fire, explosion or leakage of hazardous waste materials to the environment must be immediately reported to the Fire Department first, and then to the Coordinator and Manager, Traffic Department as soon as possible. The following emergency numbers should be used for communication:

Fire Department - 6408  
Coordinator, Hazardous Waste - 7350  
Manager, Traffic, Akron Operations - 6161  
4444

Emergencies after normal working hours should be reported to the Manager, Traffic, Akron Operations - D. K. Robinson - 864-9718 and the Coordinator, Hazardous Waste - R. E. Jereb - 745-2593.

2. The Fire Department will respond to the emergency situation (fire, explosion or leakage of hazardous waste material) using trained personnel and procedures accepted by the State of Ohio. The on-site hazardous waste control record will provide vital information to the Fire Department to determine the equipment or procedures necessary to control the emergency.
3. In a situation of extreme emergency where the life or health of the occupants of an office or production building is endangered, the Fire Department will notify Plant Protection to begin evacuation of the affected areas using the Firestone Fire and Evacuation Program.
4. The following emergency equipment to control fire, explosions or unplanned release of hazardous waste to the environment, based on knowledge of the waste expected to be generated and stored in the "hazardous waste storage area", are provided: rubber boots, rubber gloves, rubber aprons, face respirators, and chemical fire extinguishers.
5. The Firestone Medical Department has been provided with a list of all EP toxic, accutely toxic and hazardous-to-health materials, which could be potentially stored in hazardous waste storage areas, to be used to treat illnesses or emergency situations brought about by any fire, explosion or unplanned release of hazardous waste materials to the environment. This list will routinely be reviewed and maintained.

R. E. JEREB  
COORDINATOR, HAZARDOUS WASTE  
TRAFFIC, AKRON OPERATIONS  
REJ:pgm

412 E. OTHER PERMITS

HIT NUMBER	EMISSION SOURCE	POLLUTANT	EXPIRATION DATE
677010129 P053	BUFFER NO 4, BUFFER GRINDER, SMALL CUT OUT	RUBBER DUST	REGISTRATION
P056	BUFFER, GRINDER, PAINTER WHITE SIDEWALL	RUBBER DUST PAINT FUMES	"
P058	HVY DUTY BUFFING - BALANCE PATCH	RUBBER DUST	"
P063	AIRBAG GRINDING	RUBBER DUST	"
P064	DOPE MIXING & BEAD CEMENTING		10-21-83
P065	BANBURY RUBBER MIXING 72, 73, 74	CARBON BLACK	REGISTRATION
P070	BANBURY 161	CARBON BLACK	REGISTRATION
P071	PELLET HANDLING & STORAGE	SOAPSTONE POWDER	10-21-83
P072			
P073			
P074	CARBON BLACK SYSTEM	CARBON BLACK	10-21-83
P075	FLAP PRESSES	1	REGISTRATION
P077	CURING OVEN	.	REGISTRATION
P078	NO 73 STOCK MIXING UNIT		REGISTRATION
P079	STEEL CORD CALENDER		REGISTRATION
P081	TIRE GRINDER	RUBBER DUST	REGISTRATION
P084	BLEMISH PAINT MACHINE		4-10-83
P088	161 BANBURY PIGMENT WEIGHING	PIGMENT DUST	



# RCRA Inspection Report

EPA Identification Number OHD 001288109

HWFAS Permit Number (if appropriate) 02-77-0325

Facility Name Firestone Tire & Rubber Company

Location 1200 Firestone Parkway  
Akron, Ohio 44317

Person(s) Interviewed	Title	Telephone
<u>Robert Jereb</u>	<u>Hazardous Waste Coordinator</u>	<u>216-399-7350</u>

Inspector(s)	Agency/Title	Telephone
<u>Deborah J. Berg</u>	Ohio EPA <u>EPA Scientist</u>	<u>216-425-9171</u>
	Ohio EPA	
	Ohio EPA	

## Installation Activity

Mark One

- ☐ Generator only (G)
- ☐ Transporter only (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☒ G-T-TSDF

- ☐ Waste Piles S03
- ☐ Land Treatment D01
- ☐ Landfills D00

If the site is a TSDF, check the boxes indicating which forms were used -

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting
- ☐ Groundwater Monitoring
- ☒ Closure and Post-Closure
- ☒ Financial Requirements
- ☒ Containers S01
- ☐ Tanks S02/T01
- ☒ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment T03
- ☐ Chemical/Physical/Biological T04

## RCRA INTERIM STATUS INSPECTION FORM

## PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OH0 001288109

Facility: Firestone Tire & Rubber Company Address: 1200 Firestone Parkway City: Akron  
State: Ohio Zip Code: 44317 County: Summit Telephone: 379-6161  
Facility Contact: D. K. Robinson  
Facility Operator: Robert E. Jereb Title: Coordinator - Hazardous Waste Telephone: 379-2350  
Facility Owner: Firestone Tire & Rubber Company Address: 1200 Firestone Parkway  
City: Akron State: Ohio Zip Code: 44317 Telephone: 379-6409 (security)  
Type of Ownership: ☒ Private ☐ Government State HWFAB No. 02-77-0325  
Date of Inspection: 6-10-82 / 8-10-82 <sup>recheck</sup> Time of Inspection: (Start) 1:30 p.m. (Finish) 4:00 p.m.  
Advance Notification? ☐ No ☒ Yes: scheduled May 27, 1982  
Weather Conditions: hazy, temperature mid 70's F.

## INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Robert Jereb</u>	<u>Hazardous Waste Coordinator</u>	<u>216-379-2350</u>
2.			
3.			
4.			

# RCRA INTERIM STATUS INSPECTION FORM

## INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	<u>Deborah J. Berg</u>	<u>Environmental Scientist</u>	<u>210-425-9171</u>
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☐ Treatment  
D. ☒ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001, F002, F003, F004, F005

b) Non-Listed Wastes: ☒ D001 I ☐ D002 C ☐ D003 R ☐ D000 T

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

☐ Yes, See Remark #          ☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

       Yes, See Remark #       

✓ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

✓ Yes, Complete Part 3 (Transp.)

       No

*transports from Central Research Lab (C) to  
Research Pilot Plant storage area (TSD)*

a) Applicable U.S. EPA I.D. Number OHD 001288109

b) Ohio P.U.C.O. GR TRSF Number 433 HW

7. A brief description of site activity:

*On-site storage in drums (maximum 18) of listed & characteristic waste.*

REMARKS, PART 1. (GENERAL INFORMATION)

*The World Headquarters facility consists of several production/experimental/administrative divisions. These divisions are referred to in this report (copy attached) as satellite generators. Only F001, F002, F003, F004, F005, & D001 wastes, produced by these divisions, are stored in the permitted storage area. All other hazardous wastes produced are removed from the facility within 90 days of generation (predominantly lab-packed). All activities are coordinated through the hazardous waste coordinator. He accompanies satellite generators to the storage area when wastes are added to the storage area.*

# RCRA INTERIM STATUS INSPECTION FORM

## PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Remark # 1</u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>boiler plant - elementary neutralization unit</u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	✓	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	✓	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	✓	—	—	available, & actually supplied by Chem-Freight
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	✓	—	—	—
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	✓	—	—	—
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	—	—	✓	—
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days or less</u> without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:	✓	—	—	satellites - Remark #2
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable <del>DOT pre-transport requirements for packaging, labeling and marking.</del>	✓	—	—	—

# RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.	✓	—	—	—
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	✓	—	—	inspected by satellite generators and/or haz. waste coordinator
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	✓	—	—	—
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	—	—	✓	—
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	✓	—
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	—	—	✓	—
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	—	—	✓	—
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	✓	—	—	discipline of satellite generator managers conducted by haz waste coordinator on Feb 4 June 1992
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	✓	—	—	—



# RCRA INTERIM STATUS INSPECTION FORM

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

Yes No N/A Remark #

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

## REMARKS, PART 2. GENERATOR REQUIREMENTS

- Remark #1 Company has on file a complete list of material data sheets for all raw materials. In most instances, these data sheets are utilized to characterize resultant wastes. Satellite generators have been advised to use these data sheets, and to proceed with analyses for those waste streams which ~~are~~ are chemically derived from experiments using the raw materials that differ substantially. A Firestone waste code form is completed for each waste & maintained by the facility (copy attached).
- Remark #2 Compliance with generator regs (storage < 90 days) by the satellite generators is here delineated



# RCRA INTERIM STATUS INSPECTION FORM

## PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Remark #1</u>
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a) and 3745-53-30-A).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
9. Does the transporter store hazardous wastes temporarily while they are in transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

## REMARKS, PART 3. TRANSPORTER REQUIREMENTS

Remark #1 The World Headquarters is the transporter for waste generated by Firestone Central Research (a) that is shipped to the Firestone Research Pilot Plant (TSD).

# RCRA INTERIM STATUS INSPECTION FORM

## PART 4: GENERAL INTERIM STATUS REQUIREMENTS

### SUBPARTS INCLUDED

B: General Facility Standards      E: Manifest/Records/Reporting      H: Financial Requirements  
C: Preparedness and Prevention      F: Ground Water Monitoring  
D: Contingency and Emergency      G: Closure

### Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Remark #1
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	* by Firestone guards
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	* storage area on concrete pad fenced & locked
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(i) and 3745-55-14-B-2-b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	* storage area locked; access to Firestone proper controlled by guards
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Inspect emergency equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Firestone Fire</u>
b) Inspect monitoring equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) Inspect security, alarm and communications devices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Firestone Security</u>
d) Inspect process equipment (pipes, pumps, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Inspect containment structures (dikes, curbs, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Firestone Fire &amp; Haz Waste Coord.</u>
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g) Inspect hazardous waste handling/loading areas each day used.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Firestone Fire &amp; Haz Waste Coord.</u>
h) Record of any malfunctions due to equipment or operator errors.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
i) Record of any hazardous waste discharges.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Remark #2</u>
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. If required due to the actual hazards associated with <u>Ignitable</u> <u>Reactive</u> or <u>Corrosive</u> waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Remark #3</u>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

## Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Internal alarm system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>padding &amp; fire/evacuation systems in plant area</u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>truck radio &amp; fire office phone</u>
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Akron City water</u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>at storage area &amp; at satellite generator area</u>

# RCRA INTERIM STATUS INSPECTION FORM

- |   | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>                          | <u>Remark #</u>   |
|---|-------------------------------------|--------------------------|-------------------------------------|-------------------|
| 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                   |
| 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <i>documented</i> |
| 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).   | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |                   |

## Subpart D: Contingency and Emergency

- |  |                                     |                          |                          |                                      |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------------------|
| 1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <i>revised plan reviewed 8/10/82</i> |
| a) Actions to be taken by personnel in the event of an emergency incident.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                                      |
| b) Arrangements or agreements with local or state emergency authorities.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                                      |
| c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                                      |
| d) A list of all emergency equipment including location, physical description and outline of capabilities.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                                      |
| e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                                      |
| 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <i>documented</i>                    |

# RCRA INTERIM STATUS INSPECTION FORM

- |  | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>                          | <u>Remark #</u> |
|--|-------------------------------------|--------------------------|-------------------------------------|-----------------|
| 3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                 |
| 4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                 |
| 5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.           | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |                 |

## Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- |   | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>               | <u>Remark #</u>                             |
|---|-------------------------------------|--------------------------|--------------------------|---|
| 1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <i>hazardous waste control record forms</i> |
| b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| c) The estimated (or actual) weight, volume or density of the waste material(s).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |

# RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
e) The present physical location of each hazardous waste within the facility.	—	—	✓	—
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	—	—	✓	—
g) Records of any waste analyses and trial tests required to be performed.	✓	—	—	—
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	✓	—	—	—
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	—	—	✓	—
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	✓	—	—	—
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	✓	—	—	—

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	—	—	✓	—
---	---	---	---	---

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	—	—	✓	—
--	---	---	---	---



# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	—	—	✓	—
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	—	—	✓	—
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	—	—	✓	—
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	—	—	✓	—

## Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	—	—	✓	—

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____

## Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>submitted 7/21/81 &amp; reviewed.</i>
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55, -56, -57, -58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
d) A description of steps taken to decontaminate facility equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>closure not anticipated</i>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	✓	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	✓	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	✓	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	✓	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	✓	—

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	✓	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	✓	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	✓	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	✓	—

# RCRA INTERIM STATUS INSPECTION FORM

- |  | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|------------|-----------|------------|-----------------|
| 9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10. | —          | —         | ✓          | —               |

## Subpart II: Financial Requirements

- |  |   |   |   |   |
|--|---|---|---|---|
| 1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32). | ✓ | — | — | — |
|--|---|---|---|---|

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

## REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

- Remark #1 See Remark #1, Part #2. Management program appears to be quite workable.*
- Remark #2 Personal Training required as a condition for interim status & Ohio HWFAB permit has been accomplished for those individuals (Fire, Security, waste handlers) directly responsible for activities related to the storage facility.*
- Remark #3 Wastes stored includes F001, F002, F003, F004, B005, D001.*

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# RCRA INTERIM STATUS INSPECTION FORM

## PART 5. TREATMENT/STORAGE/DISPOSAL

### SUBPARTS INCLUDED

I: Management of Containers  
J: Management of Tanks  
K: Surface Impoundments

L: Waste Piles  
M: Land Treatment  
N: Landfills

O: Incinerators  
P: Thermal Treatment  
Q: Chemical/Physical/Biological Treatment

### Subpart I: Management of Containers

1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51, -52-53).
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).

Yes   No   N/A   Remark #

☒   ☐   ☐   \_\_\_\_\_

☒   ☐   ☐   \_\_\_\_\_

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).

Yes   No   N/A   Remark #

☒   ☐   ☐   \_\_\_\_\_

☐   ☐   ☒   \_\_\_\_\_

# RCRA INTERIM STATUS INSPECTION FORM

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

Yes No N/A Remark #

✓ — — —

# CHEM-FREIGHT C.

P. U. C. O. 11239 - I

KRICK ROAD INDUSTRIAL PARKWAY

33 INDUSTRY DRIVE • BEDFORD, OHIO 44146 • (216) 439-2955

August 14, 1981

Firestone Tire & Rubber Co.  
Attn: Bob Gerab  
1200 Firestone Pkwy.  
Akron, Ohio 44317

Mr. Bob Gerab;

In reference to your Manifest No. A-3 and Alabama Manifest No. 019136 for shipment of 28 drums for disposal at Chemical Waste Management in Emelle, Alabama.

Please be advised that these drums are loaded for shipment aboard the trailer that will transport them to Alabama. In an effort to lower the shipping costs to our customers we try to consolidate small shipments into full trailer loads. This has been the case with your shipment and is the reason for the delay in the shipment.

Sincerely;



Albert W. Orr  
Terminal Mgr.  
Chem-Freight Inc.

AO/nmf

Industrial Waste Transport

AUG 21 1981



## HAZARDOUS WASTE MANIFEST

A3

MANIFEST DOCUMENT NUMBER

CHEM FREIGHT

NAME OF CARRIER

(SCAC)

SHIPPER NUMBER

CARRIER NUMBER

## IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	0HD-001288109	FTR (FIRESTONE TIRE & RUBBER) CO., 1280 FETNE. PKWY. AKRON, OH 44317 (216) 379-6836	6/24/81
TRANSPORTER # 1	0HD-075006304	CHEM FREIGHT, 33 INDUSTRY DRIVE BEDFORD, OH (216) 439-2955	
TRANSPORTER # 2 (if required)			
TSDT TREATMENT STORAGE OR DIS- POSAL FACILITY	ALT-000622464	CHEMICAL WASTE MANAGEMENT, P.O. BOX 55, EMELLE, AL 35459 1-205-652-9531	
TSDT TREATMENT STORAGE OR DIS- POSAL FACILITY			

## WASTE INFORMATION

Q. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
24	X	0001	SOLVENT, N.O.S. (FLAMMABLE)	HA1993		<23°	GAL	1200		
4	X	0001	CEMENT, RUBBER (FLAMMABLE)	HA1133		<23°	GAL	200		

## SPECIAL HANDLING INSTRUCTIONS

If an RC commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

## COMMENTS

n "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

## PLACARDS TENDERED

Yes ☐ No ☐

EMIT  
C.O.D. TO:  
ADDRESS

COD

Amt: \$

C.O.D. FEE:  
PREPAID ☐  
COLLECT ☐ \$

TOTAL CHARGES: \$

## FREIGHT CHARGES

FREIGHT PREPAID  
except when box at  
right is checked ☐ Check box if charges  
are to be collect

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.  
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is 'carrier's or shipper's weight.'"

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:  
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature

(Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or

any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

## CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE &amp; DATE

TRANSPORTER #2 SIGNATURE &amp; DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

GENERATOR'S SIGNATURE

DATE

TSDT SIGNATURE

DATE

4

# Firestone



August 14, 1981

RECEIVED  
AUG 20 1981  
WASTE MANAGEMENT BRANCH  
EPA, REGION V

US Environmental Protection Agency  
Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Attention: Mr. Charles Grigalauski

Gentlemen:

In reference to our Firestone Tire & Rubber Company manifest #A-3, I find that we did not receive a properly signed manifest from our TSD facility, namely Chemical Waste Management, Emelle, Alabama, within the 45-day limit.

On August 12, 1981, I contacted Chemical Waste Management by phone and was advised that the shipment never reached Chemical Waste Management in Alabama. I promptly called our transporter, Chem-Freight, Inc. in Bedford, Ohio, and was advised that the material in question was in fact at the Chem-Freight facility awaiting shipment to Alabama.

Attached please find a copy of our manifest #A-3 along with a letter of explanation from Chem-Freight, Inc.

Very truly yours,

R. E. Jereb  
Coordinator, Hazardous Waste  
Traffic, Akron Operations  
The Firestone Tire & Rubber Company

REJ:pgm

Attachments

cc: Ms. Deborah Berg  
Ohio EPA  
2110 East Aurora Road  
Twinsburg, Ohio 44087, w/att.

AUG 21 1981

RECEIVED  
8-21



February 2, 1990

U.S. EPA  
Region V  
230 S. Dearborn St.  
Chicago, IL 60604

ATTN: Regional Director

SUBJECT: Soft Hammer Demonstration

In their demonstration sent to the U.S. EPA Region III Director (attached), Firestone Tire & Rubber, 1200 Firestone Parkway, Akron, OH 44017, selected Erieway, Inc. to provide disposal service for their soft-hammer waste. As indicated, Erieway has contracted to have this waste recycled to provide for protection of human health and the environment.

This demonstration and certification is providing the new designated facility as opposed to Thermalkem in Rock Hill, SC, which was the previous destination. The demonstration and certification was signed July 31, 1989 by D.C. McMiller.

WASTE: ✓ U122 Formaldehyde

FACILITY: Environmental Enterprises, Inc.  
4650 Spring Grove Avenue  
Cincinnati, OH 45232

CONTACT: Ms. Jenny Damron  
(513) 541-1823

DATE OF  
CONTACT: January 9, 1990

CERTIFICATION: I certify under penalty of law that the requirements of 40 CFR 288.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

  
Tina M. Burrell  
Waste Acceptance Coordinator  
Erieway, Inc.

cc: Firestone Tire & Rubber  
Environmental Enterprises, Inc.

1365

RECEIVED  
FEB 07 1990  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

RECEIVED  
WMD RCRA  
RECORD CENTER

2/9/93

OH0001288 109

# Firestone

## SOFT HAMMER DEMONSTRATION

Waste Type: Formaldehyde - U122

Facility Name and Address: Thermalkem, Inc.  
2324 Vernesdale Rd.  
Rock Hill, SC 29730

EPA I.D. No.: SCD 044 442 333

Contact Name and Phone No.: Mickey Humphries, Sales  
(803) 329-9690

My company has contracted with Erieway, Inc., 33 Industry Dr., Bedford, OH 44146, to place my waste at a facility offering proper treatment and disposal. Thermalkem, a licensed incinerator is such a facility. Incineration is the best demonstrated available treatment technology for my soft hammer waste.

D. C. McMullen  
Signature

7/31/89

**D. Corrective  
Action**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

September 8, 1993

Mr. Gene Velchek  
Bridgestone/Firestone, Inc.  
2500 N. 2nd Street  
Decatur, IL 62526

Re: Visual Site Inspection  
Bridgestone/Firestone, Inc.  
(Formerly Firestone Tire and Rubber Co.)  
Akron, Ohio  
OHD 001 288 109

Dear Mr. Velchek:

As indicated in the letter of introduction sent to you on January 6, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSİ) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief  
Minnesota/Ohio Technical Enforcement Section  
RCRA Enforcement Branch



## CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Cathy Collins  
Date: February 28, 1994

RECEIVED  
WMD RECORD CENTER

JAN 31 1995

### Background Facility Information

Facility Name: Bridgestone/Firestone, Inc. (Formerly Firestone  
Tire and Rubber Company)  
EPA Identification No.: OHD 001 288 109  
Location (City, State): Akron, Ohio  
Facility Priority Rank: Low

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility, which consists of six SWMUs and three AOCs

### Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

- ☐ No corrective action activities initiated (Go to 5)  
☒ RCRA Facility Assessment (RFA) or equivalent completed  
☐ RCRA Facility Investigation (RFI) underway  
☐ RFI completed  
☐ Corrective Measures Study (CMS) completed  
☐ Corrective Measures Implementation (CMI) begun or completed  
☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit  
☐ Post-closure permit  
☐ Enforcement order  
☒ Other (Explain)

Facility is conducting voluntary remediation of contaminated groundwater.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes  
☐ No  
☐ Uncertain; still underway  
☒ Not required

Additional explanatory notes:

Interim measures have not been officially required but voluntary groundwater remediation is still underway.

## Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

- ☒ Groundwater  
☐ Surface water  
☐ Air  
☒ Soils

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater: \_\_\_\_\_

Surface water: \_\_\_\_\_

Air: \_\_\_\_\_

Soils: \_\_\_\_\_

- ☐ No  
☒ Uncertain

- 7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 8a)  
☐ No  
☒ Uncertain

Additional explanatory notes:

Additional underground storage tanks (UST) at the facility may have leaked; extent of contamination has not been determined.

- 7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

Additional USTs at the facility may have leaked; extent of contamination has not been determined. Groundwater is not used as a source of drinking water.

- 8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 9)  
☐ No  
☒ Uncertain

Additional explanatory notes:

Additional USTs at the facility may have leaked; extent of contamination has not been determined.

- 8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

- ☒ Yes  
☐ No  
☐ Uncertain

Additional explanatory notes:

Additional USTs at the facility may have leaked. Extent of contamination has not been determined. The nearest sensitive environment, a wetland, is located 0.2 mile west of the facility.



### Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

Final corrective measures have not been identified or planned; extent of contamination has not been identified.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

The extent of groundwater contamination has not been fully determined.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

The extent of groundwater contamination has not been fully determined.

### Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

☐ Solid  
☐ Light non-aqueous phase liquids (LNAPLs)  
☐ Dense non-aqueous phase liquids (DNAPLs)  
☒ Dissolved in groundwater or surface water  
☐ Gaseous  
☐ Other \_\_\_\_\_

13. Which of the following major chemical groupings are of concern at the facility?

☒ Volatile organic compounds (VOCs) and/or semi-volatiles  
☐ Polynuclear aromatics (PAHs)  
☐ Pesticides  
☐ Polychlorinated biphenyls (PCBs) and/or dioxins  
☐ Other organics  
☐ Inorganics and metals  
☐ Explosives  
☐ Other \_\_\_\_\_

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

☐ Yes; Indicate possible course of action.

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☒ No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

The extent of groundwater contamination has not been fully determined.

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15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

☐ Yes  
☐ No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

☐ Yes  
☐ No

#### Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

☐ Yes  
☐ No  
☐ Uncertain

Additional explanatory notes:

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17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

☐ Yes  
☐ No  
☐ Uncertain

Additional explanatory notes:

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ENFORCEMENT  
CONFIDENTIAL

**Conclusion**

18. Is this facility an appropriate candidate for stabilization activities?

- ☐ Yes
- ☐ No, not feasible
- ☐ No, not required
- ☒ Further investigation necessary

Explain final decision, using additional sheets if necessary.

The following information was obtained from a 1993 PA/VSI prepared by PRC. The facility is currently conducting remediation of groundwater contamination at the former location of one raw material solvent UST. The facility also operated two additional raw material solvent UST farms. No groundwater samples were taken and soil samples were not analyzed for organics during closure activities at these two tank farms.

PRC Environmental Management, Inc.  
233 North Michigan Avenue  
Suite 1621  
Chicago, IL 60601  
312-856-8700  
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**BRIDGESTONE/FIRESTONE, INC.  
(FORMERLY FIRESTONE TIRE  
AND RUBBER COMPANY)  
AKRON, OHIO  
OHD 001 288 109**

**FINAL REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	OHD 001 288 109
Date Prepared	:	August 26, 1993
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032OH44
Prepared by	:	PRC Environmental Management, Inc. (John Maher)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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RELEASED  
DATE 1/18/01  
RIN #  
INITIALS sk



## EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Bridgestone/Firestone, Inc. (formerly Firestone Tire and Rubber Company [Firestone]), facility in Akron, Summit County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The Firestone facility was farmland prior to Harvey Firestone's purchase of the property in the early 1900s. The Firestone facility had been used to manufacture rubber tires since 1911 when the facility began operating. Firestone began phasing out tire production in 1981, with the production of truck, tractor, airplane, and car tires ending March 16, 1981. Since, 1981 the facility has been used as a corporate office building with laboratories and workshops that test tire quality, design production equipment, and conduct polymer research. In May 1988, Bridgestone purchased Firestone, and the facility currently operates under the name Bridgestone/Firestone, Inc., and employs about 700 people. The facility currently operates as a conditionally-exempt small quantity generator of hazardous wastes generated from laboratory, maintenance, and research activities.

The manufacture of tires at the Firestone facility involved mixing natural or synthetic rubber, carbon black, and other additives in banbury mixers to form rubber suitable for tire production. The formulated rubber was molded and was extruded into various components, which were assembled into tires.

In 1980, Firestone submitted to EPA a Notification of Hazardous Waste Activity Form and a Part A permit application (Firestone 1980a; Firestone 1980b). The Part A permit application indicated that the facility stored hazardous waste in containers (S01). This Hazardous Waste Container Storage Area (SWMU 1) underwent RCRA closure on February 23, 1988.

The following hazardous waste streams have been generated at the Firestone facility: waste cement (D001), flammable solvent (D001, F003, and F005), waste solvent and paint mixture (D001), lab packs (D001, D002, D019, D022, F002, F003, F004, F005, U122, and U281), halogenated solvents



(F001 and F002), Door Pond sludge (D001), waste fabric dip (D008, U122, and U201). The following nonhazardous waste streams have been generated at the Firestone facility: used oil, cyclone dust, Xylos wastewater, PCB-contaminated oil, and tread-cooling wastewater.

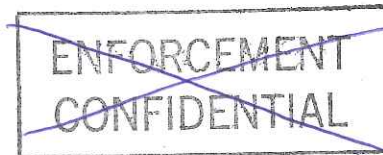
The assembly of the tire components required the use of solvents, such as naphtha, hexane, heptane, and alcohol, to formulate a solvent and rubber mixture referred to as "cement." Raw material solvents used in formulating the cement were stored in 13 underground storage tanks (UST). Occasional cleaning of the cement storage tanks generated waste cement (D001). In 1981, the USTs and cement storage tanks were removed, because cement was no longer produced.

A former operation at the Firestone facility involved on-site rubber reclamation by Xylos, which is a former subsidiary of Firestone. Xylos' operations generated nonhazardous wastewater contaminated with oil and cured rubber, both of which floated on the wastewater's surface. A concrete sump, which Firestone representatives refer to as the Door Pond (SWMU 5), was used to pretreat wastewater generated from the Xylos operations. After Xylos ceased operations in 1967, the Door Pond (SWMU 5) was used as secondary containment for process oil tanks located indoors on the west side of the facility. In early 1986, Firestone ceased using the Door Pond (SWMU 5) for secondary containment. At that time, an ignitable, PCB-contaminated sediment, which is referred to by the facility representatives as "Door Pond Sludge" (D001), was removed from the Door Pond, and the Door Pond was cleaned. The Door Pond (SWMU 5) is now situated under one of Firestone's parking lots.

The PA/VSI identified the following six SWMUs and three AOCs at the facility:

#### Solid Waste Management Units

1. Hazardous Waste Container Storage Area
2. Hazardous Waste Satellite Accumulation Areas
3. Used Oil Container Storage Area
4. Nonhazardous Waste Accumulation Areas
5. Door Pond
6. Groundwater Remediation Air Stripper







#### Areas of Concern

1. Xylos Operation USTs
2. Former Cement House USTs
3. Former Plant No. 2 USTs

The potential for releases to groundwater, surface water, and on-site soils is low for SWMUs 1, 2, 3, 4, and 6. SWMUs 1 through 4 have concrete surfaces, SWMU 1 underwent RCRA closure, SWMUs 2, 3, and 4 are located indoors, and SWMU 6 is designed to remove contaminants from groundwater. No releases from SWMUs have been documented.

The potential for release to groundwater and on-site soils from SWMU 5 is high because PRC presumes the SWMU to be about 30 years old, it is constructed of 4-inch-thick concrete, and the integrity of the concrete while it was in operation is not known. In addition, during the cleanup of this SWMU in 1986, PCBs were detected in the sediments contained in this SWMU, but no soil or groundwater samples were collected and analyzed to determine if a release of PCBs from the unit had occurred. The potential for release to surface water from SWMU 5 is low because there is no documentation of a release from the SWMU and it is currently underground.

The potential for a release to groundwater, surface water, and on-site soils is moderate for the Xylos Operation USTs (AOC 1) and the Former Cement House USTs (AOC 2). No release from either of these SWMUs has been documented; however, none of the USTs in AOCs 1 and 2 was tested for tightness. These USTs were constructed of carbon steel, and their ages are unknown.

Groundwater and on-site soils contamination near the Former Plant No. 2 USTs (AOC 3) has been documented, and the groundwater is currently being remediated with an air stripper (SWMU 6). The potential for a release to surface water from AOC 3 is low, because sample analyses have confirmed that groundwater contamination extends no more than about 100 feet laterally from the USTs.

The potential for a release to air from SWMUs 1 through 5 and all AOCs is low. SWMUs 1 and 5 no longer store waste. SWMUs 2, 3, and 4 are located indoors and consist of containers of waste that are either stored closed or contain nonvolatile, oily materials. None of the USTs in AOCs 1, 2, and 3 are currently in use. The USTs in AOC 1 have been filled with concrete. The USTs in



AOC 2 were removed from the facility in 1981. The USTs in AOC 3 were removed from the facility in 1980. Proper operation of SWMU 6 will result in a controlled release into the air of the contaminants that are extracted from the groundwater.

The facility occupies 110 acres in a predominantly industrial area in Akron, Ohio; however, a few neighbors of the facility are commercial, residential, or office buildings. The nearest residential area is located about 200 feet east of the facility's southeast boundary, as identified by the Part A permit application. Akron has a population of about 223,000.

The nearest surface water body, Summit Lake, is located about 0.5 mile west, northwest of the facility and is used for recreational purposes. A tributary of the Ohio Canal, which drains into Summit Lake, is located within 50 feet of the facility's west boundary, as delineated by the facility Part A permit application.

Groundwater is not used as a source of drinking water for the City of Akron. Surface water from Lake Rockwell, which is located about 10 miles northeast of the facility, is used as the primary source of drinking water for the Akron area.

Sensitive environments are not located on site. The nearest sensitive environment, an intermittently exposed and permanent, open water, lower perennial, riverine system, is located 0.2 mile west of the facility. This riverine system drains into Summit Lake, which is also a sensitive environment.

PRC recommends that no further action be taken for SWMUs 1 through 4. PRC recommends sampling the soil and groundwater adjacent to SWMU 5 and AOCs 1 and 2. PRC recommends analyzing the soil and groundwater samples adjacent to SWMU 5 for PCBs. PRC recommends analyzing the soil and groundwater samples adjacent to AOCs 1 and 2 for organic constituents to determine the extent of contamination and the need for further action. PRC recommends OEPA or EPA review the progress towards remediation of the contaminated groundwater at AOC 3, which is managed by SWMU 6.

In addition, PRC recommends informing OEPA of the findings of this PA/VSI regarding the facility's groundwater remediation activities associated with AOC 3 and SWMU 6.



## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Bridgestone/Firestone, Inc. (formerly Firestone Tire and Rubber Company [Firestone]), facility (EPA Identification No. OHD 001 288 109) in

Akron, Summit County, Ohio. The PA was completed on March 23, 1993. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on March 26, 1993. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified six SWMUs and three AOCs at the facility.

The VSI is summarized and nine inspection photographs are included in Appendix A. Field notes from the VSI are included in Appendix B.

## **2.0 FACILITY DESCRIPTION**

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

### **2.1 FACILITY LOCATION**

The Firestone facility is located at 1200 Firestone Parkway in Akron, Summit County, Ohio.

Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°03'06" N and longitude 81°31'55" W) (Firestone 1980b). The facility occupies about 110 acres in a predominantly industrial area, although there are some commercial and residential properties adjacent to the facility.

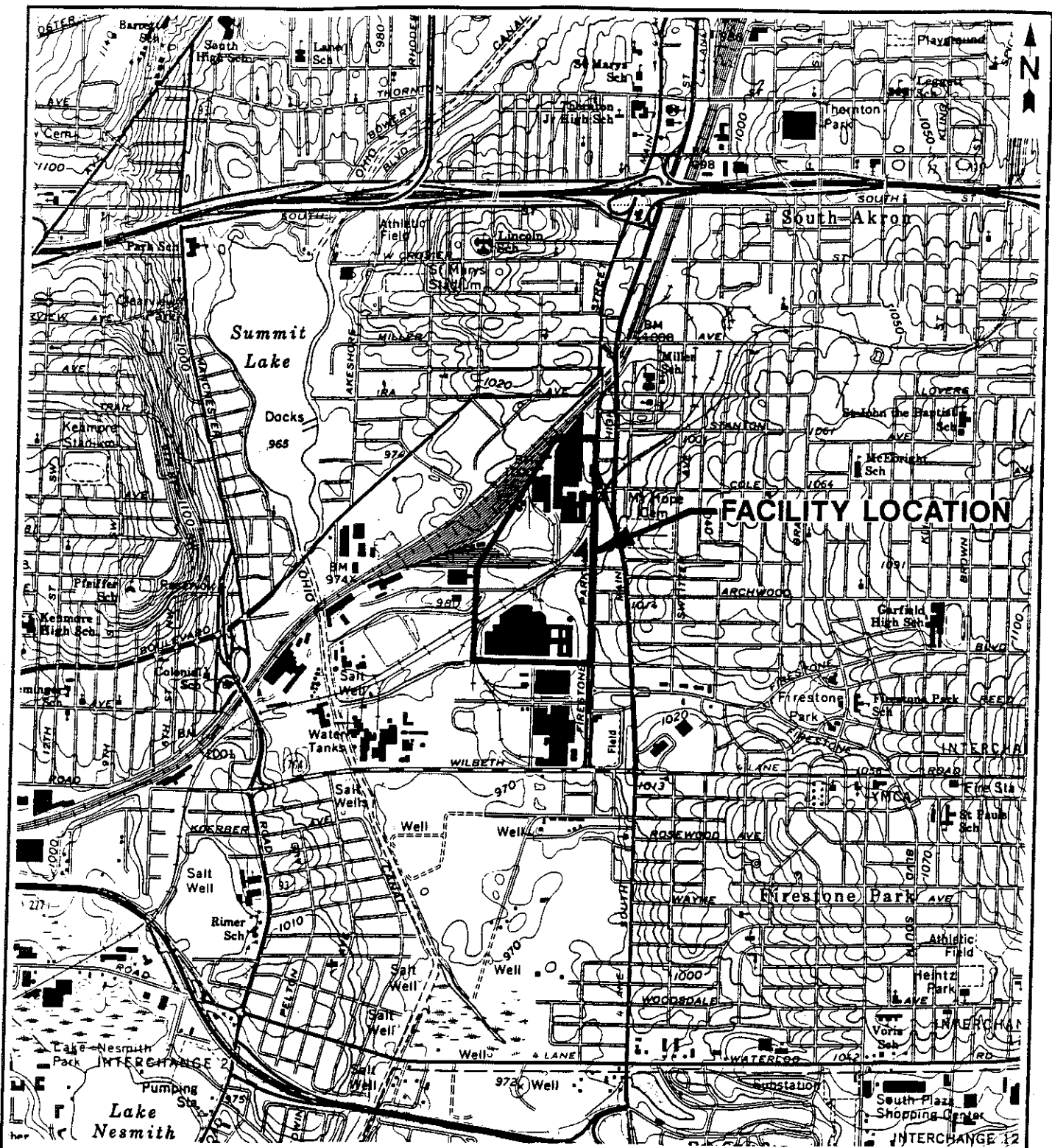
The facility is bordered on the north by a railroad, on the west by a railroad and industrial property, on the south by industrial property, and on the east by industrial, commercial, and office properties and a few residences.

### **2.2 FACILITY OPERATIONS**

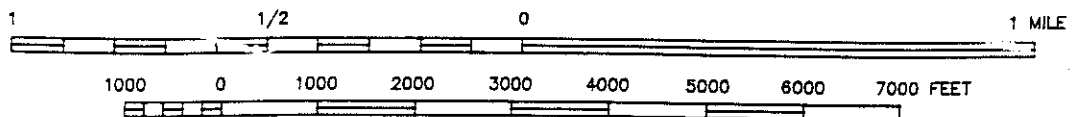
The Firestone facility was farmland prior to Harvey Firestone's purchase of the property in the early 1900s. The Firestone facility had been used to manufacture rubber tires since 1911 when the facility began operating. Firestone began phasing out tire production in 1981 with the production of truck, tractor, airplane, and car tires ending March 16, 1981. Although small quantities of racing tires are currently being manufactured at the facility, since 1981 the facility been used primarily as a corporate office building with laboratories and workshops that test tire quality, design production equipment, and conduct polymer research. In May 1988, Bridgestone purchased Firestone, and the facility currently operates under the name Bridgestone/Firestone, Inc., and employs about 700 people.

The manufacture of tires at the Firestone facility involved mixing natural or synthetic rubber, carbon black, and other additives in banbury mixers to form rubber suitable for tire production. The





SCALE 1:24000



SCALE: 1" = 2,000'



QUADRANGLE LOCATION

BRIDGESTONE/FIRESTONE, INC.  
AKRON, OHIO

FIGURE 1  
FACILITY LOCATION

**PNC** ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: MODIFIED FROM USGS,  
AKRON WEST, OHIO, QUADRANGLE, 1992

FIRESTNE.DWG - 07/06/93 - M.L.B. 308RD50320H44

formulated rubber was molded and was extruded into various components, which were assembled into tires.

The assembly of the tire components required the use of solvents such as naphtha, hexane, heptane, and alcohol. A solvent and polymer (rubber) mixture, which Firestone refers to as "cement", was used to bond the rubber components together. The solvent in the cement would volatilize, and the residual rubber of the cement provided a tacky surface for bonding layers of rubber that formed a tire. Different solvents were used during different times of the year. Highly volatile solvents were typically used during the winter, and less volatile solvents were typically used during the summer. Cement was stored in aboveground tanks located in a building called the cement house. Occasional cleaning of the cement tanks generated waste cement (D001). Raw material solvents used in formulating the cement were stored in 13 underground storage tanks (UST), which are referred to in this report as the Former Cement House USTs (AOC 2). In 1981, these tanks were removed and the cement house was demolished.

Xylos, a former subsidiary of Firestone, reclaimed rubber on site near the southwest corner of the facility until about 1967. The Firestone facility representatives did not know when the Xylos operations began. During the installation of a parking lot in 1984, Firestone discovered four 10000-gallon USTs that had also been used by the Xylos operation. These tanks contained resins and solvent at the time the Xylos operation was active (Firestone 1984a). The management of these tanks after their discovery is discussed in Section 4.0 of this report. Xylos operations generated wastewater contaminated with oil and cured rubber, both of which floated on the wastewater's surface. A concrete sump, which Firestone representatives refer to as the Door Pond (SWMU 5), was used to pretreat wastewater generated from the Xylos operations. After Xylos ceased operating, the Door Pond (SWMU 5) was used as secondary containment for process oil tanks located indoors on the west side of the facility. In early 1986, Firestone ceased using the Door Pond (SWMU 5) for secondary containment. The Door Pond (SWMU 5) is now situated under one of Firestone's parking lots.

The Firestone facility currently uses natural gas for fuel. Prior to converting to natural gas, the facility used fuel oil to power its boilers. In addition to storing No. 6 fuel oil in two 1 million-gallon aboveground tanks, the facility stored No. 2 igniter fuel oil in a 15000-gallon UST. The aboveground fuel oil tanks are empty with the exception of some viscous residue. The igniter fuel oil



UST is located below the facility's old deionized water storage tank. The UST was pressure tested, cleaned, and filled with grout in late 1985. Firestone's original Part A permit application addressed only a part of the contiguous property that Firestone owned in 1980 (Firestone 1980b). The southern half of the Firestone facility, as identified in the Part A permit application, is now owned by corporations independent of Firestone. On May 5, 1983, Firestone sold its former central warehouse building to J-V Properties. The former central warehouse is now occupied by Cotter Merchandise and Storage Co., which operates as a warehouse (Firestone 1993a). The occupant of Firestone's former headquarters office building is not known. In 1978, Plant No. 2 of the Firestone facility was demolished and removed from the facility.

### 2.3 WASTE GENERATION AND MANAGEMENT

This section describes waste generation and management at the Firestone facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

The Firestone facility operations that generated waste have changed primarily in magnitude over time. Since 1981, when tire production was phased out, the facility has been operating as a conditionally-exempt small-quantity generator. Currently, the facility generates the following hazardous and nonhazardous wastes: waste cement (D001), flammable solvents (D001, F003, and F005), waste solvent and paint mixture (D001), lab packs of samples and expired reagents (D001, D002, D019, D022, F002, F003, F004, F005, U122, and U281), used oil (nonhazardous), waste fabric dip formulations (D008, U122, and U201), cyclone dust (nonhazardous), and contaminated groundwater (nonhazardous). Hazardous and nonhazardous waste streams that the facility no longer generates include the following: halogenated solvents (F001 and F002), Door Pond Sludge (D001), Xylos wastewater (nonhazardous), oil contaminated with polychlorinated biphenyls (PCB) (nonhazardous), and tread-cooling wastewater (nonhazardous). Although the waste code F004 was included on both the facility Part A permit application and the Notification of Hazardous Waste Activity Form, this waste was apparently never generated (Firestone 1993b).

Waste cement (D001) is a solvent and rubber mixture that is generated from occasional cleaning of tanks that are used to mix and store cement. Waste cement has not been generated since 1981 when

**TABLE 1**  
**SOLID WASTE MANAGEMENT UNITS**

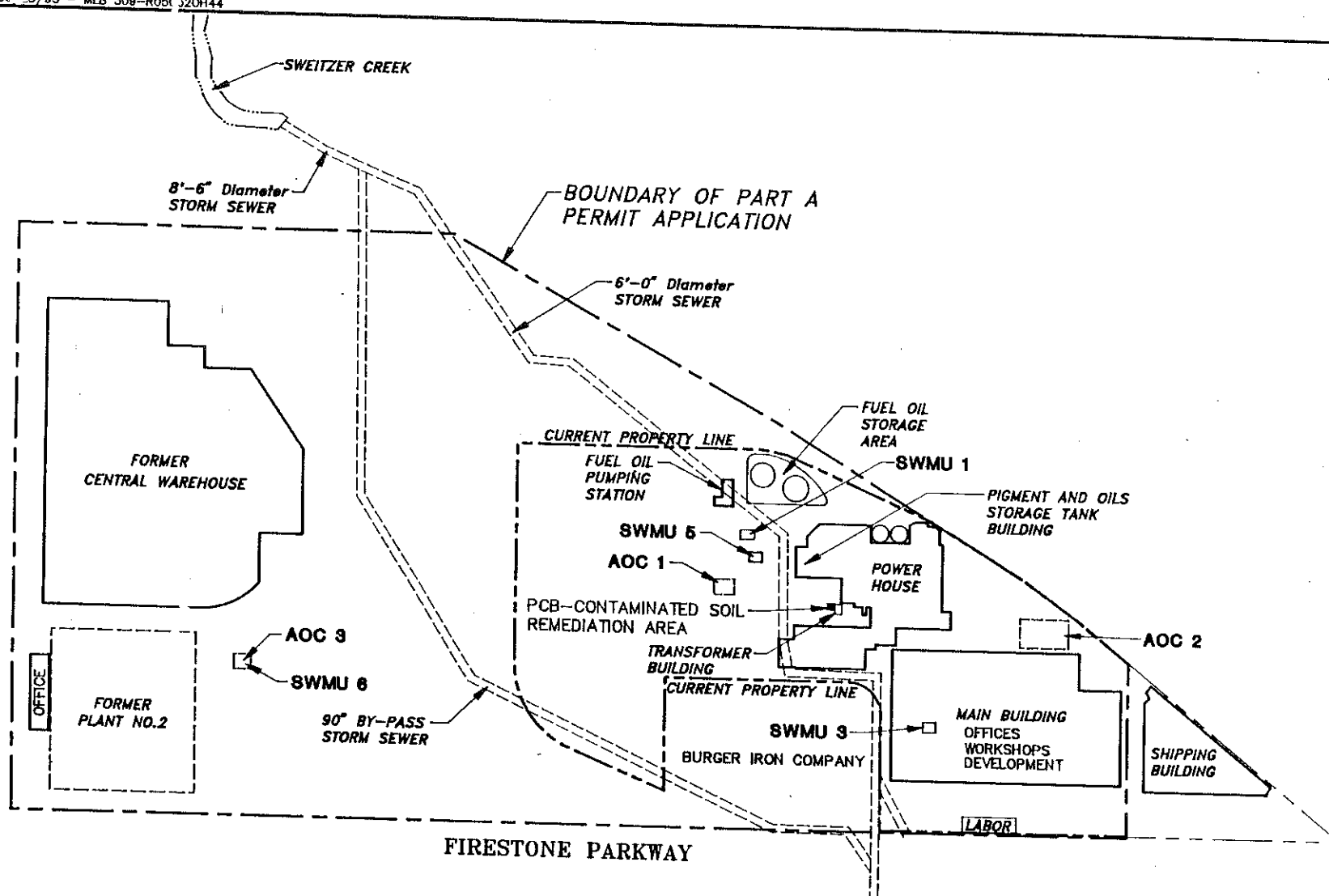
<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit<sup>a</sup></u>	<u>Status</u>
1	Hazardous Waste Container Storage Area	Yes	Inactive; RCRA closed February 23, 1988
2	Hazardous Waste Satellite Accumulation Areas	No	Active
3	Used Oil Container Storage Area	No	Active
4	Nonhazardous Waste Accumulation Areas	No	Active
5	Door Pond	No	Inactive; cleaned, backfilled, and covered by parking lot in 1986
6	Groundwater Remediation Air Stripper	No	Active

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Note:

<sup>a</sup> A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

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**SOLID WASTE MANAGEMENT UNITS**

- SWMU 1** HAZARDOUS WASTE CONTAINER STORAGE AREA
- SWMU 2** HAZARDOUS WASTE SATELLITE ACCUMULATION AREAS (LOCATED WITHIN THE MAIN BUILDING)
- SWMU 3** USED OIL CONTAINER STORAGE AREA
- SWMU 4** NONHAZARDOUS WASTE SATELLITE ACCUMULATION AREAS (LOCATED WITHIN THE MAIN BUILDING)
- SWMU 5** DOOR POND
- SWMU 6** GROUNDWATER REMEDIATION AIR STRIPPER

**AREAS OF CONCERN**

- AOC 1** XYLOS OPERATION USTs
- AOC 2** FORMER CEMENT HOUSE USTs
- AOC 3** FORMER PLANT NO.2 USTs

BRIDGESTONE/FIRESTONE, INC.  
AKRON, OHIO

**FIGURE 2**

**FACILITY LAYOUT**

SOURCE: MODIFIED FROM A FIRESTONE SKETCH RECEIVED BY PRC IN MARCH 1986

NOT TO SCALE

**PRC** ENVIRONMENTAL MANAGEMENT, INC.

**TABLE 2**  
**SOLID WASTES**

<u>Waste/EPA Waste Code<sup>a</sup></u>	<u>Source</u>	<u>Solid Waste Management Unit<sup>b</sup></u>
Waste Cement/D001 <sup>c</sup>	Cleaning cement mixing and storage tanks	1
Flammable Solvent/D001, F003, and F005	Facility laboratories and maintenance activities	1 and 2
Waste Solvent and Paint Mixture/D001	Cleaning painting equipment	2
Lab Packs/D001, D002, D019, D022, F002, F003, F004, F005, U122, and U281 <sup>d</sup>	Discarding laboratory samples and reagents	2
Halogenated Solvents/F001 and F002	Discarding laboratory samples and reagents	1 and 2
Door Pond Sludge/D001 <sup>c</sup>	Sediment accumulation from Xylos wastewater	5
Waste Fabric Dip/D008, U122, and U201	Discarding unused fabric dip formulations	2
Used Oil/NA	Maintenance of equipment	3 and 4
Cyclone Dust/NA	Air emission control cyclone	4
Xylos Wastewater/NA <sup>c</sup>	Xylos rubber reclamation operation	5
PCB-contaminated Oil/NA <sup>c</sup>	Transformers	None
Tread-cooling Wastewater/NA	Tire tread production	None

**TABLE 2**  
**SOLID WASTES**  
(Continued)

<u>Waste/EPA Waste Code<sup>a</sup></u>	<u>Source</u>	<u>Solid Waste Management Unit<sup>b, c</sup></u>
Contaminated Groundwater/NA	Groundwater remediation	6

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Notes:

- <sup>a</sup> Not applicable (NA) designates nonhazardous waste.
  - <sup>b</sup> "None" indicates that the waste stream is not managed on site.
  - <sup>c</sup> This waste stream is no longer generated at the facility.
  - <sup>d</sup> This waste stream is no longer accumulated on site prior to disposal.
-

the facility discontinued the manufacture of tires and, therefore, discontinued the formulation of cement. Until 1981, less than 55 gallons of waste cement was generated each year. The waste cement was placed in a 55-gallon drum, and stored in the Hazardous Waste Container Storage Area (SWMU 1). The disposition of this waste is not known.

Flammable solvent mixtures (D001, F003, and F005) are generated from the facility laboratories and from maintenance activities. Currently, flammable solvent is generated at a rate of about 100 gallons per year and is accumulated in 55-gallon drums and 5-gallon cans at the Hazardous Waste Satellite Accumulation Areas (SWMU 2) that are located in the laboratories. This waste used to be consolidated in the Hazardous Waste Container Storage Area (SWMU 1). Currently, when about 55 gallons of this waste is accumulated it is picked up from the Hazardous Waste Satellite Accumulation Areas and sent to Chemical Waste Management of Carrollton, Ohio, for incineration.

Waste solvent and paint mixture (D001) is generated from cleaning painting equipment such as brushes used during maintenance operations. Waste solvent and paint mixture is generated at a rate of less than 55 gallons per year and is accumulated in a 55-gallon drum at a Hazardous Waste Satellite Accumulation Area (SWMU 2). This waste was last sent to Chemical Waste Management Resource Recovery for fuel blending (Firestone 1993b).

Lab packs (D001, D002, D019, D022, F002, F003, F004, F005, U122, and U281) are generated occasionally from the facility laboratories. Currently, lab packs contain only unusable reagents and are not accumulated on site. The Firestone facility used to test raw material samples that were received from other Firestone facilities. After samples were analyzed they were placed in lab packs in Hazardous Waste Satellite Accumulation Areas (SWMU 2) and later sent off site for disposal. The facility no longer provides laboratory analysis service for off-site facilities. Lab packs are sent to Chemical Waste Management of Carrollton, Ohio, for incineration.

Waste halogenated solvent mixtures (F001 and F002) are generated as waste reagents from laboratory operations. This waste used to be stored in the Hazardous Waste Container Storage Area (SWMU 1) before SWMU 1 underwent RCRA closure. Currently, this waste is not accumulated on site. When the facility chooses to discard laboratory reagents, the reagents are lab packed and immediately sent

off site. This waste was last sent to Chemical Waste Management Resource Recovery for fuel blending (Firestone 1993b).

Door Pond Sludge (D001) was sediment that had accumulated in the Door Pond (SWMU 5) located on site. Door Pond Sludge (D001) was contaminated with PCBs and had a flash point below 140 °F. This waste was generated only during the cleanup of the Door Pond (SWMU 5) and was sent to S.C.A. Chemical Services (currently, Chemical Waste Management Chemical Services) for incineration.

Waste fabric dip formulations (D008, U122, and U201) are generated when experimental dip formulations are no longer needed and are discarded. According to facility representatives, this waste is not a hazardous waste, but the Firestone facility chooses to handle it as a hazardous waste. Waste fabric dip formulations are accumulated at the Hazardous Waste Satellite Accumulation Area (SWMU 2) in the Advanced Technology Workshop and are sent to Chemical Analytics. Chemical Analytics is a broker who sends the waste to Chem Met Services for fixing, stabilizing, and eventually landfilling (Firestone 1993b).

Used oil (nonhazardous) is generated from maintenance activities, such as changing air conditioner oil and cutting oils, particularly at the Experimental Work Shop. About 300 to 350 gallons of used oil is generated annually. Used oil is accumulated at Nonhazardous Waste Accumulation Areas (SWMU 4) throughout the facility. Full drums of used oil are relocated to the Used Oil Container Storage Area (SWMU 3). Used oil is sent to Akron-Canton Waste Oil, which sells the oil to be used as fuel for cement kilns.

Cyclone dust (nonhazardous) is generated from four or five cyclones that controlled air emissions from grinding experimental tires and operating the experimental banbury mixers. Cyclone dust is accumulated in 55-gallon drums at Nonhazardous Waste Accumulation Areas (SWMU 4) and is disposed of as general refuse.

Xylos wastewater (nonhazardous) was generated from a rubber reclamation operation that ceased operating in 1967. Details of the Xylos operation process that generated the wastewater are not known. The wastewater was contaminated with oil and floating rubber. The wastewater was

pretreated in an on-site unit called the Door Pond (SWMU 5) prior to being discharged to the Akron sanitary sewers.

Transformers containing PCB-contaminated oil have been generated when the facility replaced PCB transformers with non-PCB transformers. The last transformers that contained PCBs were removed from the facility in about 1989. The PCB-contaminated oil from these transformers was not managed on site.

Tread-cooling wastewater (nonhazardous) is generated from the occasional overflow of recirculated water that is sprayed on fresh tread as it is produced by the extruder. The overflow was originally discharged to the Sweitzer River under a National Pollutant Discharge Elimination System (NPDES) permit, which has expired. Currently tread-cooling wastewater is not pretreated on site and is discharged to the sanitary sewer.

Contaminated groundwater (nonhazardous) is generated from groundwater remediation activities at the Former Plant No. 2 USTs (AOC 3). The following contaminants have been detected in the groundwater adjacent to the Former Plant No. 2 USTs (AOC 3): benzene, chloroform, ethylbenzene, methylene chloride, toluene, 1,1,1-trichloroethane, tetrachloroethane, 1,1-dichloroethane, and 1,1-dichloroethylene. Contaminated groundwater is pumped from the upper aquifer, treated above ground with a Groundwater Remediation Air Stripper (SWMU 6), and returned to the aquifer. Contaminated groundwater is never sent for off-site disposal.

## **2.4 HISTORY OF DOCUMENTED RELEASES**

This section discusses the history of documented releases to groundwater, surface water, air, and on-site soils at the facility. The following five releases of hazardous or toxic materials on site have been documented or alleged by facility representatives: (1) a PCB release to the Door Pond (SWMU 5); (2) a PCB spill in the main building; (3) a PCB release to soil adjacent to the transformer building; (4) an ethylene glycol release to Sweitzer Creek; and (5) organic solvent release from the Former Plant No. 2 USTs (AOC 3).



In 1985, the Door Pond (SWMU 5), which was constructed of concrete, was cleaned and backfilled with dirt. The Door Pond (SWMU 5) was originally a pretreatment system for Xylos wastewater. Later it was used as secondary containment system for the pigments and oils storage tanks. Both sludge and water samples were collected from inside the Door Pond (SWMU 5) and analyzed for heavy metals. The heavy metals that showed the highest leachable concentrations after being subjected to the Extraction Procedure (EP) Toxicity test were barium (0.2 milligram per liter [mg/L]) and lead (0.20 mg/L). No other heavy metals were detected using the EP Toxicity test (Wadsworth 1985a).

Also, PCBs were detected in sludge samples (6,400 milligrams per kilogram [mg/kg]) and water samples (5 micrograms per liter [ $\mu\text{g/L}$ ]) collected from the Door Pond (SWMU 5). Sludge samples collected from the Door Pond (SWMU 5) displayed a flash point of 95 °F and water samples displayed a flash point of 112 °F (Wadsworth 1985b). During the cleanup of the Door Pond (SWMU 5) in late 1985 and early 1986, all sludges and water were removed and incinerated at S.C.A. Chemical Services in Chicago, Illinois (Wadsworth 1986). According to facility representatives, the Xylos operation did not involve PCBs and, therefore, would not have been the source of the PCBs in the Door Pond sludge. Facility representatives speculated during the VSI that a PCB spill had occurred and contaminated the Door Pond sludge; however, they could not recall a spill involving PCBs in that area. No samples were collected from the soil or groundwater adjacent to the Door Pond (SWMU 5). No other information regarding the contaminated soil or Door Pond sludge is available.

On August 24, 1984, about 55 gallons of Askarel Dielectric Fluid, which contained PCBs, was spilled on the first floor of the main building. The spill occurred while moving a transformer with a boom lift truck. The transformer struck the mast of the lift truck, breaking the primary bushing on the transformer, and releasing PCB-contaminated oil. The spill was entirely contained on the epoxy-coated, concrete floor. Because the floor was diked and had no floor drains, about 30 gallons of oil was recovered and pumped into a drum. The remainder of the spill was cleaned up with absorbent material. The contaminated absorbent material was taken to a treatment and storage facility called High Voltage Maintenance, which is located in Mentor, Ohio. High Voltage Maintenance planned to send the waste to a landfill; however, the final disposition of this waste is not known. The 30 gallons of oil pumped from the floor was sent to S.C.A. Chemical Services in Chicago, Illinois, for

incineration. The Firestone facility notified the National Response Center and OEPA Emergency Response of the PCB spill (Firestone 1984b).

In late 1991, Firestone retained Baker Environmental, Inc. (Baker), to perform a site assessment of the Firestone facility transformer building and the area surrounding the transformer building to determine if a release of PCBs had occurred. PCBs were detected in the storm sewer catch basin sediment sample at 14 mg/kg and in the sample of sediment from a low spot on the concrete pad located adjacent to the transformer building at 67 mg/kg. Firestone then retained Baker to remediate the contaminated areas. The remedial activities included the following: (1) removing contaminated portions of the concrete pad, sediments, soils, and the catch basin; (2) containing the excavated wastes in a 20-cubic-yard roll-off box on site; (3) collecting and analyzing samples; and (4) transporting and disposing of the waste in the Chemical Waste Management landfill in Model City, New York (Baker 1993).

The remediation of the storm drain catch basin involved the removal of the sediments in the drain; excavating the basin, which was made of brick; removal of the dry, tan-brown, silty clay soil surrounding the basin; and sampling the basin sediment and the soils at the bottom of the excavation. Field screening of the basin sediment sample indicated the presence of PCBs at a concentration greater than 10 parts per million (ppm). Field screening of the soil sample indicated the presence of PCBs at a concentration between 1 ppm and 10 ppm. After field screening, one soil sample from the excavated area was collected for laboratory analysis. Laboratory analysis of the soil sample indicated non-detectable levels of PCBs (that is, less than 1 ppm). The excavation was then backfilled with asphalt. Because the outlet pipe in the basin was located above the basin sediments and no sediments were observed within the pipe, no remedial action of the pipe and surrounding area was taken (Baker 1993).

Remediation of the concrete pad involved removal of about 100 square feet of the pad and the excavation of soil to a depth of 6 to 8 inches below the concrete pad. Two soil samples were collected from the surface of the excavated area, and one soil sample was collected from the excavated soil. Field analysis of the samples from the excavated surface indicated the presence of PCBs in concentrations less than 10 ppm. Field analysis of the excavated soil sample indicated the presence of greater than 10 ppm PCBs. Analysis of a composite soil sample from the excavated

surface indicated less than 1 mg/kg of PCBs. Based on these results, Baker backfilled the excavation with asphalt and graded the area (Baker 1993).

On December 4, 1986, about 25 gallons of 24 percent ethylene glycol and about 75 gallons of water contaminated with ethylene glycol were released through a storm drain to Sweitzer Creek. A refilling system valve was left open, which allowed the release to occur. The valve was closed the same day the release was discovered, and no impact to the aquatic life of Sweitzer Creek was observed. The facility did not perform any remediation (OEPA 1986a).

Six USTs (Former Plant No. 2 USTs [AOC 3]) located northwest of Plant No. 2 stored raw material solvent from about 1943 until 1980, when the USTs were removed during the demolition of Plant No. 2. The groundwater adjacent to the Former Plant No. 2 USTs (AOC 3) was investigated in April 1986 for the presence of solvent contamination. The following contaminants were found in soil samples: benzene (0.44 ppm), chloroform (6.0 ppm), ethylbenzene (25 ppm), methylene chloride (13 ppm), toluene (5.9 ppm), 1,1,1-trichloroethane (2.0 ppm), and 1,1,2,2-tetrachloroethane (0.42 ppm). The following contaminants were found in groundwater samples collected from the upper aquifer: benzene (16 ppm), chloroform (0.01 ppm), ethylbenzene (1.5 ppm), methylene chloride (1.2 ppm), toluene (2.6 ppm), 1,1,1-trichloroethane (0.14 ppm), tetrachloroethane (0.025 ppm), 1,1-dichloroethane (0.012 ppm), and 1,1-dichloroethylene (0.02 ppm). No contamination was detected in the groundwater from the lower aquifer (WCC 1986). The groundwater adjacent to the former USTs is currently being remediated with a Groundwater Remediation Air Stripper (SWMU 6). The Groundwater Remediation Air Stripper (SWMU 6) was installed in August 1989 on a 6-inch diameter recovery and extraction well. The well is 35 feet deep. The top of the screen is located 10 feet below ground surface (bgs) and the bottom of the screen is located 30 feet bgs. The contaminants of concern that are being stripped from the groundwater include benzene, ethyl benzene, toluene, and xylene (collectively referred to as BETX) (Firestone 1993b).

## **2.5 REGULATORY HISTORY**

The Firestone facility submitted a Notification of Hazardous Waste Activity form to EPA on August 19, 1980, and identified the facility as a generator, transporter, and treatment, storage, or disposal facility of hazardous waste. The following waste codes were identified on the notification:

D001, D002, D003, D000 (that is, toxic constituents), F001, F002, F003, F004, F005, P083, P117, U002, U013, U122, and U201 (Firestone 1980a). On November 13, 1980, the facility submitted to EPA a Part A permit application for storage of hazardous waste (specifically, D001, F001, F002, F003, F004, F005, and U013) in containers (S01). This S01 unit, which is referred to as the Hazardous Waste Container Storage Area (SWMU 1), underwent RCRA closure on February 23, 1988. Information attached to the Part A permit application also indicates that the facility had an air permit for 16 emission sources. No other information obtained during the PA addresses the air permit (Firestone 1980b).

The Firestone facility has undergone 11 compliance evaluation inspections (CEI) by OEPA, EPA, and contractors for EPA. The dates of the inspections range from August 1981 to July 1990. No violations were observed during seven of the inspections (OEPA 1981; OEPA 1983a; OEPA 1985; M & E 1987; OEPA 1987; EPA 1988; OEPA 1991). The following violations were observed during the other four inspections:

<u>Inspection Date</u>	<u>Observed Violation</u>
June 10, 1982	<ul style="list-style-type: none"> <li>• Inadequate waste analysis plan (OEPA 1982)</li> </ul>
August 10, 1982	<ul style="list-style-type: none"> <li>• Inadequate waste analysis plan (OEPA 1982)</li> </ul>
June 14, 1984	<ul style="list-style-type: none"> <li>• Inadequate waste analysis plan</li> <li>• Inadequate contingency plan</li> <li>• Inadequate closure plan (OEPA 1984a)</li> </ul>
June 24, 1986	<ul style="list-style-type: none"> <li>• Incomplete inspection log</li> <li>• Incomplete contingency plan</li> <li>• No secondary emergency coordinator (OEPA 1986b)</li> </ul>

Each observed violation was resolved shortly after the respective CEI, and, based on the most recent OEPA CEI dated July 5, 1990, the facility was in compliance with RCRA hazardous waste regulations (OEPA 1983b; OEPA 1984b; OEPA 1986b; OEPA 1991).

The Firestone facility submitted a CERCLA Notification of Hazardous Waste Site form in June 1981 because the facility had transported its own hazardous waste to some local landfills. The Firestone facility does not have an on-site landfill. In November 1983, the Firestone facility discovered records of additional landfills to which the facility had transported hazardous waste, and the facility submitted

the list of landfills to EPA (Firestone 1981a; Firestone 1983). The Firestone facility no longer operates as a transporter of hazardous waste.

## **2.6 ENVIRONMENTAL SETTING**

This section describes the climate; flood plain and surface water; geology and soils; and groundwater in the vicinity of the facility.

### **2.6.1 Climate**

The climate of Summit County is temperate. The average daily temperature is 49 °F. The lowest average daily temperature is 27 °F in January, and the highest average daily temperature is 72 °F in July (NOAA 1991).

The total annual precipitation for the county averages 35 inches. The mean annual lake evaporation is about 32 inches (USDC 1968). The 1-year, 24-hour rainfall for the area is between 2 and 2.5 inches (USDC 1963).

The prevailing winds are from the south. Average wind speed is highest in January at 12 miles per hour (NOAA 1991).

### **2.6.2 Flood Plain and Surface Water**

Portions of the west side of the Firestone facility are located within the 100-year flood plain of the Ohio Canal (FEMA 1981). Summit Lake is the nearest surface water body to the facility and is used for recreation. Surface water is also used as the primary source of drinking water for the Akron area. This water is obtained from Lake Rockwell, which is located about 10 miles northeast of the facility (PRC 1993a). On-site surface water drains to on-site storm sewers, which discharge directly to Summit Lake (PRC 1993b).

### 2.6.3

### Geology and Soils

Summit County lies within the glaciated Allegheny Plateau region. The county is dominated by unconsolidated deposits of Wisconsinan age. The following three major types of glacial deposits exist in the area: (1) valley train deposits, (2) kame terraces, and (3) deposits associated with ground and end moraines. The first two types of glacial deposits are composed predominantly of sorted sand and gravel. The third is composed of unstratified and unsorted clay, silt, and sand with some gravel. Valley train and kame deposits occupy about half of the southern portion of the county. Lenses and thin sheets of sand and gravel, surrounded by nearly impermeable clay and silt, can be found within ground and end moraine deposits. The unconsolidated glacial drift ranges in thickness from approximately 3 to 300 feet (Schmidt 1979; White 1982).

The bedrock units throughout the county dip gently toward the south, with the older units outcropping in the northern part of the county. The uppermost bedrock unit is the Pottsville Group of Pennsylvanian age, which is composed of alternating layers of shale, clay, sandstone, limestone, and coal. This group outcrops mostly in the southeastern part and along the eastern border of the county. The average thickness of the Pottsville Group is 256 feet. An important member of the Pottsville Group is the Sharon Conglomerate, a basal unit composed mainly of quartz and averaging 100 feet in thickness in the Akron area (Banks and Feldman 1970).

The Sharon Conglomerate overlies the Cuyahoga Group of Mississippian age, which is composed of alternating layers of shale and sandstone and averages 250 feet in thickness. This unit outcrops in the central and northwestern portions of the county, northwest of Akron. Underlying this unit is the first subcrop formation, the Berea Sandstone of Mississippian age. This unit reaches thicknesses of 200 feet. The Berea Sandstone is underlain by the Bedford Shale of Mississippian age, which overlies the Ohio Shale of Devonian age. The basal Mississippian age units and the Ohio Shale outcrop in areas along the Cuyahoga River Valley, north of the town of Peninsula (USDA 1990).

#### 2.6.4 Groundwater

In 1985 and 1986, Woodward-Clyde Consultants (WCC) conducted a soil and groundwater assessment of the Firestone facility. The following site-specific groundwater information was obtained during that study.

WCC identified two aquifer systems below the Firestone facility. The upper aquifer is a shallow, unconfined sand aquifer and was encountered at about 15 feet bgs. The lower aquifer is confined and was encountered at about 42 feet bgs. The static water level in the lower aquifer is about 24 feet bgs, which is about 10 feet above the top of the aquifer's confining layer, indicating artesian conditions. The natural groundwater flow direction is considered to be northward from the Tuscarawas River into the Little Cuyahoga River. The aquifer is a source of industrial cooling water for manufacturers in the area. Based on information that WCC received from BF Goodrich, which is located less than one mile south of the Firestone facility and is now called Goodrich Chemical, groundwater flow appears to be to the south-southeast (WCC 1986). No groundwater supply wells exist within the facility boundary, as identified by the Part A permit application (PRC 1993b).

Regional information regarding the ground-water resources of Summit County are presented below. The use of groundwater in Summit County is derived mainly from the glacial deposits, especially outwash sand and gravel deposits as well as sandstone layers within the Pennsylvanian- and Mississippian-age bedrock.

Excellent groundwater resources are found in the unconfined outwash sand and gravel deposits along the Tuscarawas River, beneath the Akron area, and in portions of Copley Township. Depth to groundwater in two Akron wells ranges from 20 to 36 feet. Wells in this area are screened at depths ranging from 65 to 225 feet below ground surface and may yield from 200 to 1,000 gallons per minute (gpm). The hydraulic conductivity for these types of deposits ranges from  $10^{-1}$  to  $10^{-3}$  centimeters per second (cm/s). Buried valleys beneath the Little Cuyahoga River and the Cuyahoga River, as well as lenses and sheets of sand and gravel within ground or end moraines, yield from 3 to 20 gpm and exist at depths from less than 50 to 150 feet (Kaser and Harstine 1965; Schmidt 1979). At the facility, groundwater in the glacial deposits most likely flows west toward Summit Lake.

Water-bearing formations within the Paleozoic bedrock include the Sharon Conglomerate, the Berea Sandstone, and the sandstone and shale units within the Pottsville Group. Sandstone units have an estimated hydraulic conductivity ranging from  $10^{-3}$  to  $10^{-8}$  cm/s. Wells in the Pottsville Group yield 3 to 10 gpm and are available at depths of less than 95 feet. The Sharon Conglomerate is encountered at depths less than 100 feet and has yields greater than 50 gpm. Both the Sharon Conglomerate and Pottsville Group are most productive in the eastern half and the southwestern corner of the county. The Berea Sandstones yield from 5 to 20 gpm and is found at depths ranging from 50 to 250 feet. The aquifer is most productive in the north-central part of the county. Groundwater from the Cuyahoga Group sandstone has reported yields averaging 3 to 10 gpm at depths ranging from 50 to 250 feet. This aquifer is used predominantly in the lower northwestern corner of the county and along the edges of the Sharon Conglomerate (Kaser and Harstine 1965; Fetter 1988; Schmidt 1979; Bloyd 1974; Schindel, and others 1988). The regional groundwater flow in the bedrock is most likely southerly toward the Appalachian Basin (Bloyd 1974).

## **2.7 RECEPTORS**

The facility occupies 110 acres in a predominantly industrial area in Akron, Ohio; however, a few neighbors of the facility are commercial, residential, or office buildings. Akron has a population of about 223,000.

The facility is bordered on the north by a railroad; on the west by a railroad and industrial property; on the south by industrial property; and on the east by industrial, commercial, and office properties and a few residences. The nearest residential area is located about 200 feet east of the facility's southeast boundary, as identified by the Part A permit application. The part of the facility that Firestone currently owns and operates is surrounded by a chain-link fence about 8 feet high and has security guards controlling access to the facility 24 hours a day, 7 days a week. The former facility boundary, as identified by the Part A permit application, also had a perimeter fence and guards. Even though a public road crossed the facility, each of the two properties created by the dividing road had its own perimeter fence.

The nearest school, Miller School, is located about 0.2 mile northeast of the Firestone facility.



The nearest surface water body, Summit Lake, is located about 0.5 mile northwest of the facility and is used for recreational purposes. A tributary of the Ohio Canal, which drains into Summit Lake, is located within 50 feet of the facility's west boundary, as delineated by the facility Part A permit application.

Groundwater is not used as a source of drinking water for the City of Akron. However, groundwater is used as an industrial water supply for manufacturing facilities in the area. The nearest industrial well is located about 0.5 mile south of the facility. The well is located downgradient of the facility.

Surface water from Lake Rockwell, which is located about 10 miles northeast of the facility, is used as the primary source of drinking water for the Akron area (PRC 1993a).

Sensitive environments are not located on site. The nearest sensitive environment, an intermittently exposed and permanent, open water, lower perennial, riverine system, is located 0.2 mile west of the facility. This riverine system drains into Summit Lake, which is also a sensitive environment (USDI 1977).

### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the six SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

#### **SWMU 1**

#### **Hazardous Waste Container Storage Unit**

**Unit Description:** This unit is a concrete pad measuring 20 by 10 feet and 8 inches thick. It has a perimeter dike that is 8 inches thick and 8 inches high. Wire mesh and rebar were used for reinforcement. The pad is monolithic (that is, it was created with a single pour to eliminate joints) and has footers extending 3 feet 4 inches from the bottom of the pad into the ground (Firestone 1986a). The pad is surrounded by a chain-link fence that restricts access to the pad.

**Date of Startup:** The date of startup of this SWMU is unknown.

**Date of Closure:** RCRA clean closure of this SWMU was completed February 23, 1988 (OEPA 1988). This SWMU is currently inactive.

**Wastes Managed:** This SWMU stored waste cement (D001), flammable solvents (D001, F003, and F005), and halogenated solvents (F001 and F002) (Firestone 1986a).

**Release Controls:** This SWMU is made of concrete and has a concrete dike that is 8 inches thick and 8 inches high.

**History of Documented Releases:** No release from this SWMU has been documented.



**Release Controls:** All of the HWSAAs are located indoors on concrete floors. Two of the HWSAAs are also located in metal cabinets and the concrete floor of the chemical laboratory HWSAA is tiled.

**History of Documented Releases:** No releases from these HWSAAs have been documented.

**Observations:** PRC observed no cracks and minor staining of the concrete floor surfaces of these HWSAAs (see Photograph Nos. 2, 3, and 4). At the time of the VSI, each of the HWSAAs contained less than 55 gallons of hazardous waste.

### **SWMU 3                      Used Oil Container Storage Area**

**Unit Description:** This area is located in the basement of the main building. The floor is concrete. The area where 55-gallon and 5-gallon drums of used oil are stored is about 8 feet wide and 15 feet long. All of the containers are situated on wooden pallets.

**Date of Startup:** The date of startup of this SWMU is unknown.

**Date of Closure:** This SWMU is active.

**Wastes Managed:** This SWMU stores nonhazardous used oil generated from facility maintenance activities.

**Release Controls:** This SWMU has a concrete floor and is located indoors.

**History of Documented Releases:** No release from this SWMU has been documented.

**Observations:** PRC observed no cracks and little staining on the floor of this SWMU. At the time of the VSI, 20 55-gallon drums and 3 5-gallon

containers of oil were being stored in this SWMU (see Photograph No. 5).

#### **SWMU 4**

#### **Nonhazardous Waste Accumulation Areas**

**Unit Description:** Nonhazardous Waste Accumulation Areas are located throughout the facility. These areas are located indoors on concrete or brick floors and consist of 55-gallon drums.

**Date of Startup:** The dates of startup of these areas are unknown.

**Date of Closure:** These areas are active.

**Wastes Managed:** These areas accumulate nonhazardous cyclone dust and used lubricating and cutting oils.

**Release Controls:** These areas are located on concrete or brick floors inside the main building.

**History of Documented Releases:** No releases from these areas have been documented.

**Observations:** PRC observed small cracks and minor staining in the areas of these areas (see Photograph No. 6).

#### **SWMU 5**

#### **Door Pond**

**Unit Description:** This SWMU is a concrete basin located outdoors about 100 feet south of the pigments and oils storage tanks building (pigments/oils building). This SWMU was designed and operated as part of a wastewater treatment system. Details of other parts of the wastewater pretreatment system are not known. This SWMU has a diameter of about 30 to 40 feet and is made of concrete about 4 inches thick. The

depth of this SWMU is about 10 to 12 feet. A trench, presumably made of concrete, connected this SWMU to a drain in the pigments/oils building but was removed in 1986.

In about 1967 the Xylos operation was discontinued, and this SWMU was then used as the secondary containment system for tanks in the pigments/oils building. This SWMU is no longer used. In late 1985 and early 1986, this SWMU was cleaned and backfilled with dirt. A parking lot was then built on top of it.

Date of Startup:

The date of startup of this SWMU is unknown.

Date of Closure:

In 1986, this SWMU was cleaned, and wipe samples were collected from the concrete walls of the unit and were analyzed for PCBs. The sample analyses showed that no PCBs remained in the unit, the SWMU was backfilled with dirt, and an asphalt parking lot was built over the SWMU.

Wastes Managed:

This SWMU received wastewater from the Xylos operation. Because the Xylos operation involved recycling rubber, the wastewater contained oil and floating rubber.

PCBs were found in the SWMU when the unit was being cleaned in 1986; however, PCBs were not involved in the Xylos operation. Facility representatives presumed that a PCB spill had occurred in the past, but would not have been the source of the PCBs in the Door Pond sludge. Facility representatives speculated during the VSI that a PCB spill had occurred and contaminated the Door Pond sludge; however, they could not recall a spill involving PCBs in that area. No other information regarding the contaminated Door Pond sludge is available.



**History of**

**Documented Releases:**

No releases from this SWMU have been documented.

**Observations:**

This SWMU was not observed during the VSI.



#### **4.0 AREAS OF CONCERN**

PRC identified three AOCs during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

##### **AOC 1      Xylos Operation USTs**

Xylos was a former subsidiary of Firestone that ran an on-site rubber reclamation operation near the southwest corner of the facility until about 1967. During the installation of a parking lot in 1984, Firestone discovered four, carbon steel 10000-gallon USTs that had been used by Xylos. These USTs contained resins and solvent at the time the Xylos operation was active. The facility representatives did not know the age of these USTs; however, because the USTs were used in the Xylos operation in 1967, the USTs are at least 20 years old. In 1984, two of the USTs contained a small heel of viscous resin that had a pinetar odor and flash points above 210 °F. One of the other USTs was full of water. The fourth UST contained a solvent heel that had a flash point of 130 °F. Erie Way Pollution Control flushed and pumped out the contents of each of the four USTs. The wastes pumped out of the USTs were then solidified at Erie Way Pollution Control's facility in Cleveland, Ohio, and disposed of in a landfill. No information is available to determine if the waste was handled as hazardous or nonhazardous waste. Composite soil samples were collected from about mid-depth of the USTs and were analyzed for RCRA hazardous characteristics using the Extraction Procedure (EP) Toxicity test. The only parameter detected in the composite soil sample was cadmium (0.6 mg/L). Soil samples were not analyzed for organic contaminants, and no groundwater samples were collected. The four USTs were filled with concrete and remain on site (Firestone 1984a). Because the USTs were constructed of carbon steel, are presumed to have been more 20 years old when Firestone discovered them, previously contained solvents, and there is no evidence confirming that the USTs have not leaked, PRC considers these USTs an AOC.

**AOC 2****Former Cement House USTs**

Thirteen carbon steel USTs, located on the north side of the facility near the former Cement House, stored raw materials that were used to formulate a solvent and rubber mixture, which is referred to as "cement." Raw materials stored in these USTs include the following: toluene, process oil, acetone, heptane, hexane, naphtha, and alcohols. The ages of these USTs are not known (Firestone 1981b). In December 1981, the contents of these USTs were pumped out and the USTs were removed from the facility. Depending on the type of waste contained in the UST, the contents were either sent to Robert Ross & Sons for incineration or discharged to the Akron City Sanitary Sewer. After removal of the tanks from the facility, the UST excavation was backfilled and covered with gravel (Firestone 1982). No tank integrity assessments were performed, and no soil or groundwater samples were collected to determine if any of the USTs had leaked; therefore, PRC considers this an AOC (see Photograph No. 9).

**AOC 3****Former Plant No. 2 USTs**

On June 16, 1978, Plant No. 2 operations ceased. In 1980, Plant No. 2 of the Firestone facility was demolished. Plant No. 2 used six USTs for storing raw material solvent used to produce adhesives and rubber cements. These USTs were installed in about 1943 and were removed during the demolition of Plant No. 2. The USTs had the following sizes and dimensions:

<u>Tank No.</u>	<u>Size (gallons)</u>	<u>Volume (diameter x length)</u>
201	10,000	10' x 17'7"
202	10,500	8' x 28'10"
203	12,000	8' x 32'
204	12,000	8' x 32'
205	12,000	8' x 32'
206	10,000	8'6" x 27'

In April 1985, soil samples were collected from three borings that were drilled near the Former Plant No. 2 USTs (AOC 3). Analytical results of the soil samples indicated the presence of the following contaminants: benzene (0.44 ppm), chloroform (6.0 ppm), ethylbenzene (25 ppm), methylene chloride (13 ppm), toluene (5.9 ppm), 1,1,1-trichloroethane (2.0 ppm), and 1,1,2,2-tetrachloroethane (0.42 ppm) (Firestone 1986b). In 1985 and 1986, groundwater samples were collected from the three borings from which the soil samples were collected and from seven additional borings that were drilled near the Former Plant No. 2 USTs (AOC 3). Analytical results of the groundwater samples indicated the presence of the following contaminants: benzene (16 ppm), chloroform (0.01 ppm), ethylbenzene (1.5 ppm), methylene chloride (1.2 ppm), toluene (2.6 ppm), 1,1,1-trichloroethane (0.14 ppm), tetrachloroethane (0.025 ppm), 1,1-dichloroethane (0.012 ppm), and 1,1-dichloroethylene (0.02 ppm) (WCC 1986).

The groundwater adjacent to the Former Plant No. 2 USTs (AOC 3) is currently being remediated with a Groundwater Remediation Air Stripper (SWMU 6). The Groundwater Remediation Air Stripper (SWMU 6) was installed in August 1989 on a six inch diameter recovery and extraction well. The well is 35 feet deep. The top of the screen is located 10 feet below ground surface (bgs) and the bottom of the screen is located 30 feet bgs. The contaminants of concern that are being stripped from the groundwater include benzene, ethyl benzene, toluene, and xylene (collectively referred to as BETX) (Firestone 1993b).

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified six SWMUs and three AOCs at the Firestone facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, located at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

### **SWMU 1                      Hazardous Waste Container Storage Area**

**Conclusions:**                      This unit is a concrete pad measuring 20 by 10 feet and 8 inches thick. It has a perimeter dike that is 8 inches thick and 8 inches high (Firestone 1986a). The pad is surrounded by a chain-link fence that restricts access to the pad. This SWMU stored waste cement (D001), flammable solvents (D001, F003, and F005), and halogenated solvents (F001 and F002) (Firestone 1986a). RCRA clean closure of this SWMU was completed February 23, 1988 (OEPA 1988). This SWMU is currently inactive. The potential for release to environmental media is summarized below.

Groundwater, surface water, air, and on-site soils: Low. The potential for a release is low because the SWMU is made of jointless, reinforced concrete with concrete dikes, waste is no longer managed in this SWMU, and PRC observed no cracks or stains during the VSI.

**Recommendations:**                      PRC recommends no further action for this SWMU at this time.

## **SWMU 2**

### **Hazardous Waste Satellite Accumulation Areas**

#### **Conclusions:**

These HWSAAs are located within the main building. Two of the HWSAAs consist of 55-gallon drums and the other HWSAA consists of 5-gallon cans. One of the 55-gallon drums is situated on a wooden pallet on the concrete floor of the Advanced Technology Workshop and accumulates waste fabric dip (D008, U122, and U201). The other 55-gallon drum is located in a metal cabinet on the concrete floor of the paint shop and is used to accumulate a waste solvent and paint mixture (D001). The 5-gallon can unit is a metal cabinet on the concrete floor of the chemical laboratory and accumulates ignitable, halogenated, and nonhalogenated solvents (D001 and F001 through F005). The potential for release to environmental media is summarized below.

Groundwater, surface water, and on-site soils: Low. The potential for release is low because these HWSAAs are located indoors, on concrete floors, and PRC observed no cracks and little staining of the floor surfaces.

Air: Low. The potential for release is low because the containers in these HWSAAs are stored with their tops closed.

#### **Recommendations:**

PRC recommends no further action for this SWMU at this time.

## **SWMU 3**

### **Used Oil Container Storage Area**

#### **Conclusions:**

This area is located in the basement of the main building on the concrete floor. The area where 55-gallon and 5-gallon drums of used oil are stored is about 8 feet wide and 15 feet long. All of the containers are situated on wooden pallets. This SWMU stores nonhazardous used oil generated from facility maintenance activities. The potential for release to environmental media is summarized below.





Groundwater, surface water, air, and on-site soils: Low. The potential for a release is low because this SWMU is located indoors on a concrete floor, and PRC observed no cracks and little staining on the floor of this SWMU.

**Recommendations:** PRC recommends no further action for this SWMU at this time.

**SWMU 4                      Nonhazardous Waste Accumulation Areas**

**Conclusions:** These areas are located throughout the facility on concrete or brick floors and consist of 55-gallon drums that accumulate nonhazardous cyclone dust and used lubricating and cutting oils. The potential for release to environmental media is summarized below.

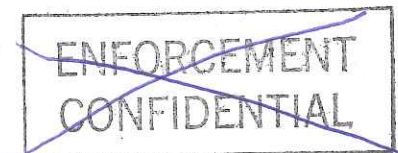
Groundwater, surface water, and on-site soils: Low. The potential for release is low because these areas are located indoors on concrete or brick floors, and PRC observed only small cracks and minor staining in the areas of these SWMUs.

Air: Low. The potential for release is low because these areas are located indoors and are either stored with their tops closed or contain nonvolatile oils.

**Recommendations:** PRC recommends no further action for this SWMU at this time.

**SWMU 5                      Door Pond**

**Conclusions:** This SWMU is a concrete basin located outdoors about 100 feet south of the pigments and oils storage tanks building (pigments/oils building). This SWMU was designed and operated as part of a pretreatment system for water contaminated with oil and floating rubber. This SWMU has a diameter of about 30 to 40 feet and is made of concrete about 4 inches thick. The depth of this SWMU is about 10 to 12 feet. In about 1967 this SWMU was used as the secondary containment system for the pigments/oils building. A trench,



presumably made of concrete, connected this SWMU to a drain in the pigments/oils building. This SWMU is no longer used. In late 1985 and early 1986 this SWMU was cleaned. Sample analyses indicated the presence of PCBs in the sediments within the SWMU, and the sediments were sent off site for disposal. After the cleanup, sample analyses showed that no PCBs remained in the unit. The SWMU was backfilled with dirt, and an asphalt parking lot was built over it. The potential for release to environmental media is summarized below.

Groundwater and on-site soils: High. The potential for a release is high because PRC presumes the SWMU to be about 30 years old, it is constructed of 4-inch-thick concrete, and the integrity of the concrete while it was in operation is not known. In addition, during the cleanup of this SWMU in 1986, PCBs were detected in the sediments contained in this SWMU, but no soil or groundwater samples were collected and analyzed to determine if a release of PCBs from the unit had occurred.

Surface Water: Low. The potential for a release is low because there is no documentation of a release from the SWMU and it is currently underground.

Air: Low. The potential for a release is low because this SWMU managed water, solid rubber, and nonvolatile compounds (that is, PCBs).

Recommendations: PRC recommends sampling soil and groundwater adjacent to this SWMU and analyze the samples for PCBs.

#### **SWMU 6**

#### **Groundwater Remediation Air Stripper**

Conclusions: This SWMU was installed in August 1989 to remove organic solvent contaminants from the groundwater adjacent to the Former Plant No. 2 USTs (AOC 3). This SWMU is a modular, packed, ceramic-column air stripper. About 10 gallons of groundwater per minute are pumped through this SWMU.



This SWMU is cleaned on occasion when there is excessive back pressure in the unit. The operation of this unit by Firestone is voluntary. Although Firestone informed OEPA of the installation of the monitoring wells and this SWMU, OEPA is not overseeing the treatment activities. According to Firestone, the Akron Regional Air Quality Board gave Firestone approval for operating this SWMU, but no permit was necessary (PRC 1993c). The potential for release to environmental media is summarized below.

Groundwater, surface water, and on-site soils: Low. The potential for release to groundwater, surface water, and on-site soils is low because this unit was designed to remove contaminants from groundwater. If operated properly, operating this unit will reduce the potential for release to these media.

Air: Proper operation of this unit results in a controlled release into the air of the contaminants that are extracted from the groundwater.

Recommendations: PRC recommends EPA notify OEPA of the findings of this PA/VSI regarding this SWMU. In addition, PRC recommends OEPA or EPA review this SWMU's progress towards remediation of the groundwater.

#### **AOC 1**

#### **Xylos Operation USTs**

Conclusions: During the installation of a parking lot in 1984, Firestone discovered four 10000-gallon USTs that had been used by Xylos. These four 10000-gallon USTs were used to store resins and solvent. In 1984, two of these USTs contained small heels of viscous resin, one contained water, and one contained solvent. Erie Way Pollution Control flushed the USTs, pumped out the contents, and disposed of the wastes. No information is available to determine if the waste was handled as a hazardous or nonhazardous waste. Composite soil samples collected from areas between the USTs detected only cadmium (0.6 mg/L). Soil samples were not analyzed for organic



contaminants, and no groundwater samples were collected. The four USTs were filled with concrete and remain on site (Firestone 1984a). The potential for release to environmental media is summarized below.

Groundwater, surface water, and on-site soils: Moderate. The potential for a release is moderate because these USTs are carbon steel, were never tested for tightness, and were probably more than 20 years old at time they were cleaned and filled with concrete.

Air: Low. The potential for a release is low because these USTs are below the ground surface and are not vented to the atmosphere.

Recommendations: PRC recommends sampling soil and groundwater adjacent to the USTs and analyzing the samples for organic constituents.

## AOC 2                      Former Cement House USTs

Conclusions: Thirteen carbon steel USTs, located on the north side of the facility near the former Cement House, stored raw materials that were used to formulate a solvent and rubber mixture, which is referred to as "cement." Raw materials stored in these USTs include the following: toluene, process oil, acetone, heptane, hexane, naphtha, and alcohols. The ages of these USTs are not known (Firestone 1981b). In December 1981, the contents of these USTs were pumped out and the USTs were removed from the facility. After removal of the tanks from the facility, the UST excavation was backfilled and covered with gravel (Firestone 1982). No tank integrity assessments were performed, and no soil or groundwater samples were collected to determine if any of the USTs leaked. The potential for release to environmental media is summarized below.

Groundwater, surface water, and on-site soils: Moderate. The potential for release is moderate because these USTs were carbon steel, were never tested



for tightness, and were likely to be more than 20 years old at the time they were removed.

Air: Low. The potential for release is low because these USTs were below the ground surface and currently no longer exist.

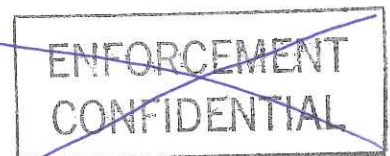
Recommendations: PRC recommends sampling soil and groundwater adjacent to the USTs and analyzing the samples for organic constituents.

### AOC 3                      Former Plant No. 2 USTs

Conclusions: In 1980, Plant No. 2 of the Firestone facility was demolished and removed from the facility. Plant No. 2 used six USTs for storing raw material solvent used to produce adhesives and rubber cements. These USTs were installed in about 1943 and removed during the demolition of Plant No. 2.

In April 1985, the soil and groundwater adjacent to these USTs were assessed for organic contamination. Analytical results of soil samples indicated the presence of the following contaminants: benzene (0.44 ppm), chloroform (6.0 ppm), ethylbenzene (25 ppm), methylene chloride (13 ppm), toluene (5.9 ppm), 1,1,1-trichloroethane (2.0 ppm), and 1,1,2,2-tetrachloroethane (0.42 ppm) (Firestone 1986b). Analytical results of groundwater samples indicated the presence of the following contaminants: benzene (16 ppm), chloroform (0.01 ppm), ethylbenzene (1.5 ppm), methylene chloride (1.2 ppm), toluene (2.6 ppm), 1,1,1-trichloroethane (0.14 ppm), tetrachloroethane (0.025 ppm), 1,1-dichloroethane (0.012 ppm), and 1,1-dichloroethylene (0.02 ppm) (WCC 1986). The potential for release to environmental media is summarized below.

The groundwater adjacent to the Former Plant No. 2 USTs (AOC 3) is currently being remediated with an air stripper (SWMU 6) that was installed in August 1989. The contaminants that are currently being stripped from the

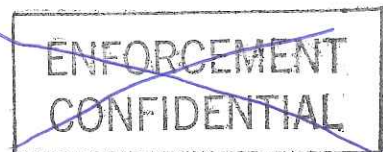


groundwater include benzene, ethyl benzene, toluene, and xylene (collectively referred to as BETX) (Firestone 1993b). The potential for a release to environmental media is summarized below.

Surface Water: Low. The potential of a release is low. Although there is surface water (that is, a tributary of the Ohio Canal) close to the facility, sample analyses have confirmed that groundwater contamination extends no more than about 100 feet laterally from the Former Plant No. 2 USTs (AOC 3).

Air: Low. The potential of a release is low. A Groundwater Remediation Air Stripper (SWMU 6) is extracting volatile organic compounds from the groundwater and venting them into the air under conditions imposed by OEPA.

Recommendations: PRC recommends EPA notify OEPA of the findings of this PA/VSI regarding this AOC. In addition, PRC recommends OEPA or EPA review the progress towards remediation of the groundwater adjacent to this AOC.



**TABLE 3**  
**SWMU AND AOC SUMMARY**

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Hazardous Waste Container Storage Area	Unknown date to 1988	No	No further action
2. Hazardous Waste Satellite Accumulation Areas	Unknown date to present	No	No further action
3. Used Oil Container Storage Area	Unknown date to present	No	No further action
4. Nonhazardous Waste Accumulation Areas	Unknown date to present	No	No further action
5. Door Pond	Unknown date to early 1986	No	Sample soil and groundwater adjacent to this SWMU and analyze for PCBs
6. Groundwater Remediation Air Stripper	August 1989 to present	No	Notify OEPA of the PA/VSI findings; OEPA or EPA review groundwater remediation progress

**TABLE 3**  
**SWMU AND AOC SUMMARY**  
(Continued)



<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Xylos Operation USTs	Unknown date to about 1967	No	Sample soil and groundwater adjacent to USTs; analyze the samples for organic constituents
2. Former Cement House USTs	Unknown date to about 1981	No	Sample soil and groundwater adjacent to USTs; analyze the samples for organic constituents
3. Former Plant No. 2 USTs	Unknown date to 1978	Yes; organic solvent contamination of groundwater and soils confirmed	Notify OEPA of the PA/VSI findings; OEPA or EPA review groundwater remediation progress

## REFERENCES

- Baker Environmental, Inc. (Baker). 1993. "PCBs Remediation of Contaminated Soils/Media Adjacent to the Transformer Building at the Bridgestone/Firestone Akron, Ohio Plant." February.
- Banks, P.O., and R.M. Feldman (editors). 1970. *Guide to the Geology of Northeastern Ohio*. Northern Ohio Geological Society.
- Bloyd, R.M., Jr. 1974. "Summary of Appraisals of the Nation's Ground-Water Resources - Ohio Region." Geological Survey Professional Paper 813-A.
- Bridgestone/Firestone, Inc. (Firestone). 1980a. Notification of Hazardous Waste Activity. August 19.
- Federal Emergency Management Agency (FEMA). 1981. Flood Insurance Rate Map for Akron, Ohio. February 18.
- Fetter, C.W. 1988. *Applied Hydrogeology*. Second Edition. Merrill Publishing Company. Columbus, Ohio.
- Firestone. 1980b. Part A Permit Application. November 13.
- Firestone. 1981a. Notification of Hazardous Waste Site for CERCLA. June 9.
- Firestone. 1981b. Memorandum Regarding Proposed Disposal Methods of Wastes from Former Cement House Underground Storage Tanks (UST). From G.B. Markert. To R. Jereb. November 30.
- Firestone. 1982. Memorandum Regarding Disposal of Wastes from Former Cement House USTs. From R.E. Jereb. To J.R. Laman. January 27.
- Firestone. 1983. Letter Regarding Modifying Firestone's Notification of Hazardous Waste Site for CERCLA. November 22.
- Firestone. 1984a. Interoffice Memorandum Regarding the Management of Four Inactive USTs. From A.H. King. To "Memorandum." October 26.
- Firestone. 1984b. Letter Regarding PCB Spill in Main Building. From R.E. Jereb. To Kenneth A. Schultz, OEPA. September 14.
- Firestone. 1986a. Interoffice Memorandum Regarding Container Storage Pad Closure Plan. From D.C. McMillen. To "Memorandum." August 11.
- Firestone. 1986b. Letter Responding to Ohio Environmental Protection Agency (OEPA) Letter Dated May 29, 1986, Regarding Remedial Program for Former Plant No. 2 USTs (Area of Concern [AOC] 3). From Alva H. King. To Gary Gifford, OEPA. June 30.



- Firestone. 1993a. Handwritten Note. From Dave McMillen. To John Maher, PRC Environmental Management, Inc. (PRC). April.
- Firestone. 1993b. Letter Responding to Questions Regarding Facility Operations. From A.H. King. To John Maher, PRC. July 9.
- Kaser, P., and L.J. Harstine. 1965. *Ground-Water Levels in Ohio*. Ohio Department of Natural Resources (ODNR) Division of Water. Bulletin 41.
- Metcalf and Eddy (M & E). 1987. Letter Regarding Land Disposal Restrictions (LDR) Inspection Conducted by Metcalf and Eddy on September 30, 1987. From Dean Geers. To Catherine McCord, U.S. Environmental Protection Agency (EPA). October 15.
- National Oceanic and Atmospheric Administration (NOAA). 1991. *Normal, Means, and Extremes*.
- Ohio Environmental Protection Agency (OEPA). 1981. Letter Regarding Compliance Evaluation Inspection (CEI) Conducted by OEPA on August 14. From Paul Flanigan. To Charles T. Allen, Firestone. September 1.
- OEPA. 1982. Letter Regarding CEIs Conducted by OEPA on June 10 and August 10, 1982. From Deborah J. Berg. To George Markert, Firestone. August 13.
- OEPA. 1983a. Letter Regarding CEI Conducted by OEPA on July 21, 1983. From Deborah J. Berg. To George Markert, Firestone. August 9.
- OEPA. 1983b. Letter Regarding Firestone's Return to Compliance. From Deborah J. Berg. To George Markert, Firestone. January 4.
- OEPA. 1984a. Letter Regarding CEI Conducted by OEPA on June 14, 1984. From Deborah J. Berg. To George Markert, Firestone. June 20.
- OEPA. 1984b. Letter Regarding Firestone's Return to Compliance. From Deborah J. Berg. To Robert Jereb, Firestone. October 4.
- OEPA. 1985. Letter Regarding CEI Conducted by OEPA on March 28, 1985. From Catherine McCord. To Robert Jereb, Firestone. May 8.
- OEPA. 1986a. *Initial Pollution Incident Report*. Identification No. 12-77-406. December 4.
- OEPA. 1986b. Letter Regarding CEI Conducted by OEPA on June 24, 1986, and Regarding Firestone's Response Dated July 8, 1986, to Violations Observed. From Jennie Tuckerman. To D.C. McMillen, Firestone. July 21.
- OEPA. 1987. CEI Report for CEI Conducted by OEPA on February 18, 1987. February 18.
- OEPA. 1988. Letter Confirming Closure of Container Storage Pad. From Thomas Crepeau. To Dennis Zwink, Firestone. February 23.

- OEPA. 1991. Letter Regarding LDR Inspection Conducted by OEPA on July 5, 1990. From Ann Budich. To Thomas Anderson, Firestone. January 14.
- PRC Environmental Management, Inc. (PRC). 1993a. Record of Telephone Conversation Regarding Drinking Water Use in Akron, Ohio. Between Hans Upadhyay and Jack Tomey, Sanitary Engineer, City of Akron. January 13.
- PRC. 1993b. Record of Telephone Conversation Regarding Facility Operations. Between John Maher and David McMillen, Firestone. July 20.
- PRC. 1993c. Record of Telephone Conversation Regarding Operation of Groundwater Remediation Air Stripper (SWMU 6). Between John Maher and Donald Bennett, Firestone. July 28.
- Schmidt, J.J. 1979. *Ground-Water Resources of Summit County, Ohio*. ODNR Division of Water.
- Schindel, H.L., and others. 1988. *Water Resources Data, Ohio*. 1988. U.S. Geologic Survey Water Data Report OH-88-1.
- U.S. Department of Agriculture (USDA). 1990. *Soil Survey of Summit County, Ohio*.
- U.S. Department of Commerce (USDC). 1963. *Rainfall Frequency of the United States*. U.S. Government Printing Office. Washington DC. Technical Paper No. 40.
- USDC. 1968. *Climatic Atlas of the United States*. U.S. Government Printing Office. Washington, DC.
- U.S. Department of Interior (USDI). 1977. *National Wetlands Inventory Map*. Akron West, Ohio, Quadrangle. March.
- U.S. Environmental Protection Agency (EPA). 1988. Letter Regarding LDR Inspection Conducted by EPA on September 30, 1987. From William Muno. To David McMillen, Firestone. February 25.
- U.S. Geological Survey. 1992. Akron West, Ohio, Quadrangle.
- Wadsworth Testing Laboratories, Inc. (Wadsworth). 1985a. Analytical Results of Door Pond Sludge Sample.
- Wadsworth. 1985b. Report of Analysis of Door Pond Sludge and Water Samples. October 23.
- Wadsworth. 1986. Analytical Report of Swab Samples from the Door Pond. January 28.
- White, G.W. 1982. *Glacial Geology of Northeastern Ohio*. ODNR Division of Geological Survey. Bulletin 68.
- Woodward-Clyde Consultants (WCC). 1986. Report of Investigation, Former Plant 2 Area. April 25.



**APPENDIX A**  
**VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS**  
**(Eight Pages)**

## VISUAL SITE INSPECTION SUMMARY

Bridgestone/Firestone, Inc.  
1200 Firestone Parkway  
Akron, Ohio 44317  
OHD 001 288 109

Date: March 26, 1993

Primary Facility Representative: Alva King, Manager of Corporate Environmental Affairs  
Representative Telephone No.: 216/379-6924  
Additional Facility Representatives: David McMillen  
Donald Bennett  
E.H. Burnett  
Bill Hawks  
W.L. Poling  
Gib Radanof

Inspection Team: John Maher, PRC Environmental Management, Inc. (PRC)  
David Berestka, PRC

Photographer: David Berestka, PRC

Weather Conditions: Sunny; 55 °F

Summary of Activities: The visual site inspection (VSI) began at 9:10 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 11:15 a.m. During the tour of the facility the following SWMUs and AOCs were observed: Hazardous Waste Container Storage Area (SWMU 1), Hazardous Waste Satellite Accumulation Areas (SWMU 2), Used Oil Container Storage Area (SWMU 3), Nonhazardous Waste Accumulation Areas (SWMU 4), Door Pond (SWMU 5), Xylos Operation USTs (AOC 1), and Former Cement House USTs (AOC 2). The Groundwater Remediation Air Stripper (SWMU 6) and the Former Plant No. 2 USTs (AOC 3) were not observed during the VSI, because PRC discovered the existence of SWMU 6 and AOC 3 several days after the VSI was completed. The igniter fuel oil UST was also observed during the VSI tour.

## **VISUAL SITE INSPECTION SUMMARY**

(Continued)

The tour concluded at 12:45 p.m., at which time the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 1:30 p.m.



Photograph No. 1  
 Orientation: South  
 Description: Hazardous Waste Container Storage Area

Location: SWMU 1  
 Date: March 26, 1993



Photograph No. 2  
 Orientation: Northwest  
 Description: Hazardous Waste Satellite Accumulation Area in the Chemical Laboratory

Location: SWMU 2  
 Date: March 26, 1993



Photograph No. 3

Orientation: North

Description: Hazardous Waste Satellite Accumulation Area in the Paint Room

Location: SWMU 2

Date: March 26, 1993



Photograph No. 4

Orientation: North

Description: Hazardous Waste Satellite Accumulation Area in the Advanced Technology Workshop

Location: SWMU 2

Date: March 26, 1993





Photograph No. 5  
 Orientation: South  
 Description: Used Oil Container Storage Area

Location: SWMU 3  
 Date: March 26, 1993



Photograph No. 6  
 Orientation: South  
 Description: Nonhazardous Waste Accumulation Area

Location: SWMU 4  
 Date: March 26, 1993



Photograph No. 7

Orientation: East

Description: Door Pond (SWMU 5) in foreground; Xylos Operation USTs (AOC 1) in background and toward the right

Location: SWMU 5 and AOC 1

Date: March 26, 1993



Photograph No. 8

Orientation: East

Description: Trench connecting the Door Pond to the Pigment and Oils Storage Tanks Building

Location: SWMU 5

Date: March 26, 1993





Photograph No. 9  
Orientation: Northwest  
Description: Former Cement House USTs

Location: AOC 2  
Date: March 26, 1993

**APPENDIX B**

**VISUAL SITE INSPECTION FIELD NOTES**

**(11 Pages)**

(120)

Black

3/25/83

March 26, 1993

9:00 a.m.

BRIDGESTONE/FIRESTONE, INC  
AKRON, Ohio

David Berke } PRL  
John Maher }

Alva King, P.E. Firestone  
Donald Bennett - Firestone  
et al - as indicated  
on a sign-in sheet.

1981 - stopped production  
Headquarters moved to Nashville  
Now a tech center

1985 Harvey Firestone bought land  
1991 - product began

DJB  
3/26/93

(121)

(122)

production of truck  
tires, Manufacturing  
phased out 1981  
completed 1983

- x remained a testing facility
- x polymer research & development
- x equipment design
- x racing tire production
- x offices
- x engineering offices

farmland pre 1900

has a self-contained tire  
manufacturing process - mix the  
fabrication

DTB  
3/26/83

(123)

large power house  
originally coal - then fuel oil  
& natural gas

non-contact cooling towers

Tread cooling water  
considered noncontact by EPA

steel not made here  
mostly tire assembly

waste cement generated in  
tank cleaning

one testing lab 25 people  
700

DTB  
3/24/83

(127)

1/3 wastes - mostly solvents  
some acids

waste stream now - mostly  
lab packs

Central Warehouse  
used by Cotter Warehouse

1/3 has 3 satellite Acc. Areas  
2 kbs + printing area

1ST - starter oil tank  
15,000 gal - No. 2 fuel oil  
1985-86 - pressure tested  
granted

DJB  
3/26/93

(125)

Product storage USTs

13 solvent tanks  
pulled 1981

\* Will supply us with more  
information

4 USTs

Resin

alcohol ?

solvent ?

plasticizer?

baghouse dust + drinnel  
and land filled off site

4 or 5

one baghouses used today

DJB  
3/26/93

(126)

collets carbon Black

rubbed dust from  
grindings - recycled  
off spec - tires - cut up  
and landfilled off-site

Soots from powder  
re-used

maintenance & paint  
paint booth filter

~~no~~ no monitoring wells  
all natural gas well  
(will supply well loss)

DTB  
3/26/53

(127)

left site @ 1:30 p.m.

~~DTB~~  
3/26/53

03/26/93 Firestone

(127)

9:10 AM - 1:30 PM

Mfg stopped in 1981  
then Corp. Headquarters  
ATC

Firestone no longer owns all  
of the permitted facility.

Harvey

Firestone bought building in early  
1900s. Production began 1911.

Tires, (truck, tractor, airplane)

Phasing down products (except <sup>testing</sup> technical)  
in ~ 1981. Complete in 1982.

Testing is determining tire quality, polymer  
research.

gjn

(128)

Small laboratory mixing.  
Mixing racing tires (specialty)  
Farmland before Firestone.

Extruded and milled  
Formulation of rubber  
solvent/rubber mixtures

Non-contact cooling water  
Used coal then fuel oil then  
natural gas.

Cool probably until ~1970  
Two 1 million gal fuel oil tanks  
that have been decommissioned.

Tread cooling generated water circulated  
final rinse (cooling water) was  
dumped in sanitary sewer. Used to  
discharged to Sawyer River under  
an NPDES

(129)

Always made tire  
Wire in tire → bead  
rubber onto wire then in the  
High tensile steel not prepared  
onsite. Purchase from off site  
suppliers.

Haz wastes when tires were made:

Cement (solvent/rubber) - made on  
site with solvent and polymer.  
Used to keep the tread ~~edges~~  
on the rest of <sup>of cement</sup> tire.

Cleaning out tanks, would generate  
waste. Usually tanks, when painting  
properly did not need to be  
cleaned often. Periodic cleaning.

Chemical laboratory  
solvent (flammable) water

Cpn



130

Now generate ~ 100 gal/yr of  
solvents.

Laboratory <sup>also</sup> received samples from off site

Don't know ~~to~~ how lab waste was handled  
acids were used in past. Most  
were consumed in digesting samples.  
Flasks were collected in 5-gal containers  
Currently do equipment cleaning.

Container storage area

\* Date of startup will be provided

Comment would not have been generated beyond ~1981.

Currently lab packs largest waste  
generation. Samples

131

Akron plant #3 (Central warehouse)  
stored finish product (tires)  
at least 1967 - sold  
sold to J.B. Properties  
in \_\_\_\_\_ ?

J. B. P. used by Cotter Warehouse  
- a moving & storage company.

Currently analytical lab and  
compound lab. flaz. w.  
accum. in 5-gal containers.  
(3 areas - chemical lab,  
~~flit~~<sup>ATW</sup> ~~flit~~ Lab, ~~flit~~  
Painting area) ATW

Non haz. waste storage throughout SAA facility.

\* New NPDES

132

USTs: Igniter oil tank by  
power house.  
pressure tested, cleaned, and filled with  
concrete (grout)  
15,000 gal #2 fuel oil  
\* will look for age of tank  
could not <sup>be</sup> physically removed.  
closed late 1985.

Removed 13 tanks. in ~1988  
contained cement solvent.  
such as: Naptha  
Hexane  
Heptane  
alcohol

\* will provide UST removal and  
contents information (and age of tank)  
No analysis information of soil

for

133

heated  
5 4 tanks next to a door  
pond.

Boring made between tanks and  
sampled soil.

Pumped out, cleaned with  
detergents, and grouted w/  
concrete.

Used for resin storage. Could  
have been alcohol or other  
solvent at one time.

Possibly process oil or plasticizers

Currently have ATFW at permit

Bayhouse dust from baybury  
mixers.

Some <sup>dust</sup> bayhouse returned to process.  
N 4 or 5

(Carbon  
black) Currently <sup>Cyprus</sup> one bayhouse on roof in gym  
Compound development laboratory

(134)

Baghouse dust probably landfilled

Dust from grinding. probably sold  
off spec tires were landfilled.  
also mold flashing - predominantly  
pin vent rubber

Soapstone powder  
lubricant powder to keep pieces of  
rubber (palletizer) from sticking  
together. Reused into system

Waste paint from maintenance  
activity. Paint booth w/ dry  
filters.

No env. assessments have been  
performed.

City water used for cooling.  
Jm

(135)

\* well by of natural gas  
is available

Tour 11:15 AM - 12:45 PM

4<sup>th</sup> floor chemical lab - N.W. corner

[All drains go to sanitary - POTW]

05/00/88 Bridgestone layoff

Waste oil from Experimental Work Shop,  
EWS

AKron - (antim waste oil → fuel blend

AK Compressor oil changes, machine oil  
changes, cutting oils.

Varies 300-350 gal/yr

Jm

(136)

Cyclone dust from experimental  
bakery operation is handled  
as general refuse.

Fabric dip from discarding  
different dip formulations (exp. material)  
Dipping thread

Cement used to adhere layers  
prior to vulcanizing

Advanced Technology Workshop  
(ATW) - satellite access area

Paint Shop SAA - cabinet w/ 55 gal  
primary source of  
solvent/paint waste is from  
cleaning brushes  
~ 55 gal/year

on Dorr filters → general refuse

(137) ~~136~~

examples of:

Oil SAA → 55 gal drum on  
concrete - minor cracks; ~~not~~ not to  
steel floor.

old

Drizzled water tank on top of  
fuel oil tank.

\*Dorr Pond info will be provided

Now on asphalt parking lot  
was concrete; discontinued ~ 1986  
unknown startup

Spill containment for process oil tanks  
- part of bakery mixing.

Original purpose was to protect weatherstrips  
(oil and rubber flooring in rubber)  
from Xylos operation which  
recovered rubber (wired)

Xylos ceased operating in ~ 1967  
Xylos was a subsidiary of Firestone

Jim

(138)

PCB transformer spilled about  
50 gal in basement

Have ~~to~~ removed all PCB  
transformers from the facility.

Last ones removed last year  
~1989. Oil Materials Ltd remediation

\* will provide documentation of PCBs

20 drums and 3 5-gal pails of  
used oil in basement. Accumulated  
over several years. On concrete floor

~~John Miller 03/26/93~~

(139)

~~John Miller 03/26/93~~



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

RECEIVED  
WMD RECORDS  
SEP 11 1993

REPLY TO THE ATTENTION OF:

HRE-8J

March 16, 1993

Mr. Alva King  
Manager of Corporate Environmental Affairs  
Firestone Tire and Rubber Company  
1200 Firestone Parkway  
Akron, Ohio 44317

Re: Visual Site Inspection  
Firestone Tire and Rubber  
Company  
Akron, Ohio  
OHD 001 288 109

Dear Mr. King:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

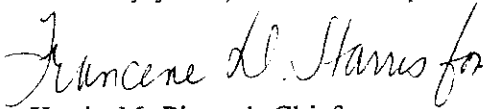
Mr. Alva King  
March 16, 1993  
Page 2

The VSI has been scheduled for Friday, March 26, 1993, at 8:00 a.m. The inspection team will consist of John Maher and David Berestka of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Francene M. Harris for Kevin M. Pierard".

Kevin M. Pierard, Chief  
OH/MN Technical Enforcement Section

Enclosure

cc: Ed Lim, OEPA, Columbus  
Dave Wertz, OEPA, Twinsburg